



# 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: Jan. 5, 2011

RE: Aluminum Trailer Co. & TN Trailers, Inc. / 039-29706-00639

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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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Aluminum Trailer Company and TN Trailers, Inc.**  
**306 S. Nappanee St.**  
**Nappanee, Indiana 46550**

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

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

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

Operation Permit No.: M039-29706-00639	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Jan. 5, 2011 Expiration Date: Jan. 5, 2021

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary towable cargo trailer manufacturing operation.

Source Address:	306 S. Nappanee St., Nappanee, Indiana 46550
General Source Phone Number:	(574) 773-8360
SIC Code:	3715, 3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### Aluminum Trailer Company - Plant 1

- (a) One (1) assembly operation, identified as ATC-SA1, constructed in 1999, with a maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (b) One (1) paint booth, identified as ATC-PB2, constructed in 2007, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 0.04 trailer frames per hour, controlled by dry filters, and exhausting through stack PB2. This is an affected source under 40 CFR 63, Subpart HHHHHH.
- (c) One (1) wood cabinet assembly and finish operation, identified as ATC-CS, constructed in 2007, applying glues, stains and varnishes using manual methods, with no particulate controls, and venting to the indoors.
- (d) One (1) woodworking operation, identified as ATC-CSWood1, constructed in 2007, with a total maximum throughput of 0.66 tons of wood per hour, consisting of saws, sanders and planers for constructing cabinet components, with particulate controlled by a dust collector, and venting to the indoors.
- (e) One (1) wood and aluminum metal cutting operation, identified as ATC-Wood1, constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors.
- (f) One (1) welding and metal cutting operation, identified as ATC-Weld1, constructed in 1999, which fabricates metal frames for non-motorized trailers at a maximum capacity of

0.5 trailer frames per hour, venting to the indoors, and consisting of the following emission units:

- (1) Six (6) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire) and 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
  - (2) Four (4) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
  - (3) Two (2) compressed air metal cutting stations, constructed in 1999, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute.
- (g) Operation of hand-held metal grinders and saws;
- (h) Application of waxes and touch-up paints; and
- (i) Operation of propane-fueled forklifts.

**TN Trailers, Inc.**

- (j) One (1) assembly operation, identified as TNT-SA, constructed in 2005, with a maximum capacity of 2.5 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (k) One (1) paint booth, identified as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 2.5 trailer frames per hour, controlled by dry filters, and exhausting through stack PB. This is an affected source under 40 CFR 63, Subpart HHHHHH.
- (l) One (1) plywood cutting operation, identified as TNT-PD, constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors.
- (m) One (1) welding and metal cutting operation, identified as TNT-Weld1, constructed in 2005, which fabricates metal frames for non-motorized trailers at a maximum capacity of 2.5 metal trailer frames per hour, venting to the indoors, and consisting of the following emission units:
- (1) Thirteen (13) metal inert gas (MIG) welding stations, each with a maximum wire usage rate of 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
  - (2) One (1) metal inert gas (MIG) welding station, with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
  - (3) Three (3) compressed air metal cutting stations, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute.

- (n) Operation of hand-held metal grinders and saws.
- (o) Application of waxes and touch-up paints.
- (p) Operation of propane-fueled forklifts

## SECTION B GENERAL CONDITIONS

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

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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 2-1.1-1) shall prevail.

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

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- (a) This permit, M039-29706-00639, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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

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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

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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

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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

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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 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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

**B.9 Preventive Maintenance Plan [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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-29706-00639 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit 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 an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.18 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

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

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

The Permittee shall not operate an incinerator 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.6 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).

C.7 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.

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

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

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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**

### **C.12 Response to Excursions or Exceedances**

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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 response steps taken.

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMMISSIONS UNITS OPERATION CONDITIONS

### Facility Description: Surface Coating Operations

#### Aluminum Trailer Company – Plant 1

- (a) One (1) assembly operation, identified as ATC-SA1, constructed in 1999, with a maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (b) One (1) paint booth, identified as ATC-PB2, approved for construction in 2007, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 0.04 trailer frames per hour, controlled by dry filters, and exhausting through stack PB2. This is an affected source under 40 CFR 63, Subpart HHHHHH.
- (c) One (1) wood cabinet assembly and finish operation, identified as ATC-CS, constructed in 2007, applying glues, stains and varnishes using manual methods, with no particulate controls, and venting to the indoors.

#### TN Trailers, Inc.

- (l) One (1) assembly operation, identified as TNT-SA, constructed in 2005, with a maximum capacity of 2.5 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (k) One (1) paint booth, identified as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 2.5 trailer frames per hour, controlled by dry filters, and exhausting through stack PB. This is an affected source under 40 CFR 63, Subpart HHHHHH.

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

Note: The lettering of the units corresponds to the letters identifying the units in Section A of this permit.

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

#### D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, for the metal surface coating operations, identified as ATC-SA1, TNT-PB, and TNT-SA, the Permittee shall not allow the discharge into the atmosphere VOC in excess of:

- (a) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
- (b) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.

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

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings,

thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.3 VOC Limit [326 IAC 8-2-9]

The paint booth, identified as ATC-PB2, shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

#### D.1.4 VOC Limitations: Wood Furniture and Cabinet Coating [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture and cabinets at ATC-CS shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.1.5 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from paint booth, identified as TNT-PB, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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

**D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]**

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A Preventive Maintenance Plan is required for this TNT-PB and its control device. 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.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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

**D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

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Compliance with the VOC content limits in Condition D.1.1 for assembly operation, identified as TNT-SA, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;  
C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;  
U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and  
n is the number of coatings being averaged

If for a given day, all coating materials used in assembly operation, identified as TNT-SA, are in compliance with the VOC content limits contained in Condition D.1.1, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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

**D.1.9 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1)

through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

- (1) The VOC content of each coating material and solvent used;
  - (2) The amount of coating material and solvent less water used on daily basis;
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted average VOC content of the coatings used for each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.1, then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day;
  - (4) The cleanup solvent usage for each day; and
  - (5) The total VOC usage for each day.
- (b) To document the compliance status with Condition D.1.4 the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.10 Reporting Requirements

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

**SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS**

**Facility Description: Cutting Equipment**

**Aluminum Trailer Company - Plant 1**

(d) One (1) woodworking operation, identified as ATC-CSWood1, approved for construction in 2007, with a total maximum throughput of 0.66 tons of wood per hour, consisting of saws, sanders and planers for constructing cabinet components, with particulate controlled by a dust collector, and venting to the indoors.

(e) One (1) wood and aluminum metal cutting operation, identified as ATC-Wood1, constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors.

**TN Trailers, Inc.**

(l) One (1) plywood cutting operation, identified as TNT-PD, constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors.

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

Note: The lettering of the units corresponds to the letters identifying the units in Section A of this permit.

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

**D.2.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the emission units identified as ATC-CSWood1, ATC-Wood1 and TNT-PD shall be limited as shown in the following table:

<b>Emission Unit ID</b>	<b>Process Weight Rate (lb/hr)</b>	<b>Allowable Emissions (lb/hr)</b>
ATC-CSWood1	1320	3.10
ATC-Wood1	900	2.40
TNT-PD	1320	3.10

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

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

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

## Compliance Determination Requirements

### D.2.2 Particulate Control

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- (a) In order to comply with Condition D.2.1, the portable dust collector and dust collectors shall be in operation and control emissions from ATC-CSWood1 and TNT-PD at all times that ATC-CSWood1 and TNT-PD are in operation.
  
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**SECTION E.1**

**FACILITY OPERATION CONDITIONS**

**Emissions Unit Description:**

**Facility Description: Surface Coating Operations**

**Aluminum Trailer Company – Plant 1**

- (b) One (1) paint booth, identified as ATC-PB2, approved for construction in 2007, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 0.04 trailer frames per hour, controlled by dry filters, and exhausting through stack PB2. This is an affected source under 40 CFR 63, Subpart HHHHHH.

**TN Trailers, Inc.**

- (k) One (1) paint booth, identified as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 2.5 trailer frames per hour, controlled by dry filters, and exhausting through stack PB. This is an affected source under 40 CFR 63, Subpart HHHHHH.

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

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

**E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63. 63.11169, the Permittee shall comply with the provisions of 40 CFR Part 63 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports 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

**E.1.2 Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources NESHAP [40 CFR Part 63, Subpart HHHHHH]**

The Permittee which engages in operation of Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit) with a compliance date of January 10, 2011:

- (a) 63.11169 (b)  
(b) 63.11170 (a)(2), (b)  
(c) 63.11171  
(d) 63.11172 (b)  
(e) 63.11173 (e), (f), (g)(2) and (3)  
(f) 63.11174

- (g) 63.11175
- (h) 63.11176 (a)
- (i) 63.11177 (a), (b), (c), (d), (g), (h)
- (j) 63.11178
- (k) 63.11180
- (l) Table 1

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Aluminum Trailer Company and TN Trailers, Inc.
<b>Address:</b>	306 S. Nappanee St.
<b>City:</b>	Nappanee, Indiana 46550
<b>Phone #:</b>	(574) 773-8360
<b>MSOP #:</b>	M039-29706-00639

I hereby certify that Aluminum Trailer Company and TN Trailers, Inc. is :

still in operation.

I hereby certify that Aluminum Trailer Company and TN Trailers, Inc. is :

no longer in operation.

in compliance with the requirements of MSOP M039-29706-00639.

not in compliance with the requirements of MSOP M039-29706-00639.

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

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

<b>Noncompliance:</b>

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

**MSOP Quarterly Report**

Source Name: Aluminum Trailer Company and TN Trailers, Inc.  
Source Address: 306 S. Nappanee St., Nappanee, Indiana 46550  
MSOP No.: 039-29706-00639  
Facility: Paint Booth ATC-PB2  
Parameter: VOC  
Limit: 15 pounds per day

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

No deviation occurred in this month.

Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

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

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

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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

**Attachment A**

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

**Aluminum Trailer Co. and TN Trailers, Inc.**

## **Title 40: Protection of Environment**

### **PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)**

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

**Source:** 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

#### **What This Subpart Covers**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) Mixing rooms and equipment;

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

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

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

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

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

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping

equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

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

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

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

## **General Compliance Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage

of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

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

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

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

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

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

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

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

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

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

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer

Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) The company name, if applicable.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and

in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

## Other Requirements and Information

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

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

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

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

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

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

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

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

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

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

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

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

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

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

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

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

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

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

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

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

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

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

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

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

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

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

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

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

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

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

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

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

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

*Painter* means any person who spray applies coating.

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

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

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

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

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

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
- (2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.
- (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

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

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

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

- (1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

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

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

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

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

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

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

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

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart <b>HHHHHH</b> is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart <b>HHHHHH</b> exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart <b>HHHHHH</b> exempts area sources from the obligation

Citation	Subject	Applicable to subpart HHHHHH	Explanation
			to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart <b>HHHHHH</b> .
§63.8	Monitoring Requirements	No	Subpart <b>HHHHHH</b> does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart <b>HHHHHH</b> does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart <b>HHHHHH</b> does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart <b>HHHHHH</b> does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart <b>HHHHHH</b> does not require startup, shutdown, and malfunction plans, or CMS.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart <b>HHHHHH</b> does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart <b>HHHHHH</b> does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart <b>HHHHHH</b> does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart <b>HHHHHH</b> does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart <b>HHHHHH</b> does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart <b>HHHHHH</b> does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
			efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart <b>HHHHHH</b> does not establish numerical emission limits.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Aluminum Trailer Company and TN Trailers, Inc.</b>
<b>Source Location:</b>	<b>306 S. Nappanee St., Nappanee, Indiana 46550</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3715, 3799</b>
<b>Permit Renewal No.:</b>	<b>M039-29706-00639</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Aluminum Trailer Company and TN Trailers, Inc. relating to the operation of a stationary towable cargo trailer manufacturer. On September 21, 2010, Aluminum Trailer Company and TN Trailers, Inc. submitted an application to the OAQ requesting to renew its operating permit. Aluminum Trailer Company and TN Trailers, Inc. was issued a MSOP M039-29706-00639 on January 24, 2006.

**Source Definition**

This stationary towable cargo trailer manufacturing source consists of operations from the following two (2) companies with manufacturing facilities located at the same address (306 South Nappanee Street, Nappanee, Indiana):

- (a) Aluminum Trailer Company; and
- (b) TN Trailers, Inc.

Since the two (2) companies operate at the same location, are owned or operated by the same person (or by persons under common control), and belong to the same major industrial grouping, they will be considered one (1) source, effective from the date of issuance of MSOP 039-21926-00639 issued on January 24, 2006.

In addition, Aluminum Trailer Company also consisted of two (2) plants:

- (a) Plant 1 is located at 306 South Nappanee Street, Nappanee, Indiana; and
- (b) Plant 2 is located at 493 Shawnee Street, Nappanee, Indiana.

However, the Plant 2 at 493 Shawnee Street, Nappanee, Indiana is no longer owned by the source. Therefore all emission units from plant 2 have been removed from this renewal permit.

**Permitted Emission Units and Pollution Control Equipment**

The source also consists of the following emission units that were constructed and/or are operating without a permit:

**Aluminum Trailer Company - Plant 1**

- (a) One (1) assembly operation, identified as ATC-SA1, constructed in 1999, with a maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and

adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.

- (b) One (1) paint booth, identified as ATC-PB2, constructed in 2007, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 0.04 trailer frames per hour, controlled by dry filters, and exhausting through stack PB2. This is an affected source under 40 CFR 63, Subpart HHHHHH.
- (c) One (1) wood cabinet assembly and finish operation, identified as ATC-CS, constructed in 2007, applying glues, stains and varnishes using manual methods, with no particulate controls, and venting to the indoors.
- (d) One (1) woodworking operation, identified as ATC-CSWood1, constructed in 2007, with a total maximum throughput of 0.66 tons of wood per hour, consisting of saws, sanders and planers for constructing cabinet components, with particulate controlled by a dust collector, and venting to the indoors.
- (e) One (1) wood and aluminum metal cutting operation, identified as ATC-Wood1, constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors.
- (f) One (1) welding and metal cutting operation, identified as ATC-Weld1, constructed in 1999, which fabricates metal frames for non-motorized trailers at a maximum capacity of 0.5 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
  - (1) Six (6) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire) and 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
  - (2) Four (4) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
  - (3) Two (2) compressed air metal cutting stations, constructed in 1999, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute.
- (g) Operation of hand-held metal grinders and saws;
- (h) Application of waxes and touch-up paints; and
- (i) Operation of propane-fueled forklifts.

**TN Trailers, Inc.**

- (j) One (1) assembly operation, identified as TNT-SA, constructed in 2005, with a maximum capacity of 2.5 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (k) One (1) paint booth, identified as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to

metal trailer frames at a maximum capacity of 2.5 trailer frames per hour, controlled by dry filters, and exhausting through stack PB. This is an affected source under 40 CFR 63, Subpart HHHHHH.

- (l) One (1) plywood cutting operation, identified as TNT-PD, constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors.
- (m) One (1) welding and metal cutting operation, identified as TNT-Weld1, constructed in 2005, which fabricates metal frames for non-motorized trailers at a maximum capacity of 2.5 metal trailer frames per hour, venting to the indoors, and consisting of the following emission units:
  - (1) Thirteen (13) metal inert gas (MIG) welding stations, each with a maximum wire usage rate of 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
  - (2) One (1) metal inert gas (MIG) welding station, with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
  - (3) Three (3) compressed air metal cutting stations, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute.
- (n) Operation of hand-held metal grinders and saws.
- (o) Application of waxes and touch-up paints.
- (p) Operation of propane-fueled forklifts.

<b>Emission Units and Pollution Control Equipment Removed From the Source</b>
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The source has removed the following emission units:

**Aluminum Trailer Company - Plant 2 (493 Shawnee Street, Nappanee, Indiana)**

- (a) One (1) assembly operation, identified as ATC-SA2, approved for construction in 2007, with a maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (b) One (1) welding and metal cutting operation, identified as ATC-Weld2, approved for construction in 2007, which fabricates metal frames for non-motorized trailers at a maximum capacity of 0.5 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
  - (1) Six (6) metal inert gas (MIG) welding stations, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire).
  - (2) One (1) metal inert gas (MIG) welding station, with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire) and 1.0 pounds per hour of carbon steel wire (GMAW Wire Type ER70S-3).

- (3) Two (2) compressed air metal cutting stations, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute.
- (c) One (1) wood and aluminum metal cutting operation, identified as ATC-Wood2, approved for construction in 2007, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors.
- (d) Insignificant activities consisting of the following:
  - (1) Operation of hand-held metal grinders and saws;
  - (2) Application of waxes and touch-up paints; and
  - (3) Operation of propane-fueled forklifts.

#### **Existing Approvals**

Since the issuance of the MSOP 039-21962-00639 on January 24, 2006, the source has constructed or has been operating under the following additional approvals:

Minor Permit Revision No.: 039-21962-00639 issued on March 22, 2007.

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

#### **Air Pollution Control Justification as an Integral Part of the Process**

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Emission Calculations**

- (a) Permit No.: M039-21926-00639, issued January 24, 2006 contained the following information on the development of emission factors for various emission units and activities stated in the permit.

The source will generate PM and PM10 emissions due to the cutting of wood and metal. The following calculations determine the unrestricted potential emissions and the estimated emissions after controls.

**Aluminum Trailer Company**

(1) Potential Emissions Before Controls:

For Aluminum Trailer Company, there are no controls for particulate (PM/PM10) emissions from cutting of wood and aluminum. The source estimates the amount of saw dust and aluminum shavings from cutting of wood and aluminum is 1.06 pounds per hour. Assuming worst case, the uncontrolled PTE of particulate matter (PM/PM10) from cutting of wood and aluminum would be 1.06 pounds of PM per hour. Assuming 8760 hours of operation per year, the uncontrolled PTE of PM/PM10 is as follows:

$$\text{Uncontrolled PTE PM/PM10} = (1.06 \text{ lb/hr}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = 4.66 \text{ tons/yr PM/PM10}$$

**TN Trailers, Inc.**

(1) Potential Emissions Before Controls:

For TN Trailers, Inc., the particulate (PM/PM10) emissions from cutting of plywood will be controlled by one portable dust collector with a control efficiency of 75%. The source estimates the amount of saw dust from cutting of plywood is 7.33 pounds per hour. Assuming worst case, the uncontrolled PTE of particulate matter (PM/PM10) from cutting of plywood would be 7.33 pounds of PM/PM10 per hour. Assuming 8760 hours of operation per year, the uncontrolled PTE of PM/PM10 is as follows:

$$\text{Uncontrolled PTE PM/PM10} = (7.33 \text{ lb/hr}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = 32.1 \text{ tons/yr PM/PM10}$$

(2) Potential Emissions After Controls:

Using a dust collector control efficiency of 75%, the PTE PM/PM10 after controls is calculated to be:

$$\text{Controlled PTE PM/PM10} = 32.1 \text{ tons/yr} * (1 - 0.75) = 8.03 \text{ tons/yr PM/PM10}$$

- (b) Based on information provided by the source, there are negligible emissions of regulated criteria pollutants and hazardous air pollutants from the compressed air metal cutting stations and the insignificant activities (i.e., operation of hand-held metal grinders and saws; application of waxes and touch-up paints; and operation of propane-fueled forklifts)
- (c) For all other emission sources, see Appendix A of this TSD for detailed emissions calculations.

<b>County Attainment Status</b>
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The source is located in Elkhart County.

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

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.  
 Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

(a) Ozone Standards

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. Elkhart 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) PM<sub>2.5</sub>

Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

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

**Fugitive Emissions**

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	71.27
PM <sub>10</sub> <sup>1</sup>	71.27
PM <sub>2.5</sub>	71.27
SO <sub>2</sub>	-
VOC	57.55
CO	-
NO <sub>x</sub>	-
Single HAP	8.07
Total HAP	16.49

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	tons/year
Xylene	8.074
Hexane	3.237
Toluene	2.847
Cumene	1.126
Methanol	1.126
Ethylbenzene	0.048
Manganese	0.03
<b>Total</b>	<b>16.49</b>

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, PM10, PM2.5 and VOC are equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

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

New Source Performance Standards (NSPS)

- (b) The requirements of the Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 Subpart MM (2M)), are not included in this permit, since this sources is not an automobile or light-duty truck assembly plant:.

- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, are not included in this permit because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP, are not included in this permit because this source does not coat plastic parts.
- (f) The paint booths ATC-PB2 and TNT-PB are subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)). The compliance date for the paint booths ATC-PB2 and TNT-PB is January 10, 2011. The paint booths ATC-PB2 and TNT-PB perform spray application of coatings to mobile equipment. Non applicable portions of the NESHAP will not be included in the permit. The emission units are subject to the following portions of Subpart HHHHHH.

- (1) 63.11169 (b)
- (2) 63.11170 (a)(2), (b)
- (3) 63.11171
- (4) 63.11172 (b)
- (5) 63.11173 (e), (f), (g)(2) and (3)
- (6) 63.11174
- (7) 63.11175
- (8) 63.11176 (a)
- (9) 63.11177 (a), (b), (c), (d), (g), (h)
- (10) 63.11178
- (12) 63.11180
- (13) Table 1

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHHH.

The requirements of the National Emission Standards for Hazardous Air Pollutants Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), do not apply to surface coating operations ATC-SA1 and TNT-SA, because these operations apply adhesives and caulking not a coating.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included in the permit, because this source's SIC is not listed.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

### State Rule Applicability - Entire Source

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

### State Rule Applicability – Individual Facilities

- (g) Surface Coating Operation ATC-SA1
  - (1) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The surface coating operation, identified as ATC-SA1, applies adhesives, sealants, glues, stains and varnishes to wood and metal surfaces using manual methods. Pursuant to 326 IAC 6-3-1(b)(14), the ATC-SA1 operation is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

- (2) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)  
The Surface Coating Operation ATC-SA1 performs a metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and Surface Coating Operation ATC-SA1 has actual VOC emissions greater than 15 pounds per day, each. Therefore, Surface Coating Operation ATC-SA1 is subject to 326 IAC 8-2-9.

(h) Surface Coating Operation ATC-CS

- (1) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The surface coating operation, identified as ATC-CS, applies adhesives, sealants, glues, stains and varnishes to wood surfaces using manual methods. Pursuant to 326 IAC 6-3-1(b)(14), the ATC-CS operation is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (2) The surface coating operation, identified as ATC-CS, is not subject to the requirements of 326 IAC 8-2-9, because the it does not coat metal.
- (3) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)  
The surface coating operation, identified as ATC-CS, was constructed after July 1, 1990, has actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and applies organic coatings to wood furniture or cabinets. Therefore, this emission unit is subject to the requirements of 326 IAC 8-2-12. Pursuant to 326 IAC 8-2-12, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture and cabinets at ATC-CS shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

ATC-CS applies coatings with roller, brush, and wipe methods of application. Therefore, ATC-CS can comply with the requirements of 326 IAC 8-2-12.

(i) Paint Booth ATC-PB2

- (1) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The paint booth, identified as ATC-PB2, applies surface coatings to metal using airless spray guns. However, this surface coating manufacturing process applies less than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 do not apply.

- (2) The paint booth, identified as ATC-PB2, was constructed after July 1, 1990, but these facilities have actual VOC emissions less than fifteen (15) pounds per day before add-on controls. Therefore, the requirements of 326 IAC 8-2-9 do not apply.
  - (A) The VOC usage for the paint booth shall be less than 15.0 pounds per day. Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.
  - (B) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the paint booth each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the paint booth:
    - (i) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
    - (ii) The total VOC usage for each day.
  - (C) Records of all required monitoring data, reports and support information required by this exemption 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.
  - (D) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.
- (j) Paint Booth TNT-PB
  - (1) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The paint booth, identified as TNT-PB, applies a coating using two (2) airless spray guns and has the potential to use greater than five (5) gallons per day of coatings. Therefore, the requirements of 326 IAC 6-3-2 are applicable to TNT-PB. Pursuant to 326 IAC 6-3-2(d), particulate from TNT-PB shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so

that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (2) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)  
The paint booth TNT-PB performs a metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and paint booth TNT-PB has actual VOC emissions greater than 15 pounds per day, each. Therefore, paint booth TNT-PB is subject to 326 IAC 8-2-9.
- (k) Surface Coating Operation TNT-SA
- (1) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The surface coating operations, identified as TNT-SA, Pursuant to 326 IAC 6-3-1(b)(14), the TNT-SA operation is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
  - (2) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)  
The Surface Coating Operation TNT-SA performs a metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and Surface Coating Operation TNT-SA has actual VOC emissions greater than 15 pounds per day, each. Therefore, Surface Coating Operation TNT-SA is subject to 326 IAC 8-2-9.

Surface Coating Operations: ATC-SA1, TNT-SA, TNT-PB

- (l) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
- (1) The surface coating operations, identified as ATC-SA1, TNT-PB, and TNT-SA, perform coat metal and/or plastic and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and has actual VOC emissions greater than 15 pounds per day, each. Therefore, surface coating operations, identified as ATC-SA1, TNT-PB, TNT-SA are subject to 326 IAC 8-2-9 and have the following requirements:
    - (A) Pursuant to 326 IAC 8-2-9(d), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:
      - (i) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
      - (ii) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

    - (B) Each of the coatings used in the ATC-SA1 operation has a VOC content less than 3.5 pounds per gallon, excluding water. Therefore, the source is able to comply

with 326 IAC 8-2-9. Pursuant to 326 IAC 8-1-0.5(b), the Acrysol cleanup solvent is not considered a coating because it does not provide a protective, functional, or decorative films therefore is exempt from 326 IAC 8-2-9 requirements.

- (C) Each of the coatings used in paint booth TNT-PB has a VOC content less than 3.5 pounds per gallon, excluding water. Therefore, the source is able to comply with 326 IAC 8-2-9.
- (D) Some coatings used in the TNT-SA operation exceed 3.5 pounds of VOC per gallon, excluding water. Therefore, compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

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

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

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

#### Cutting and Grinding Operations

- (m) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-2, the particulate emissions from the emission units identified as ATC-Wood1, ATC-CSWood1 and TNT-PD shall be limited as shown in the following table:

<b>Emission Unit ID</b>	<b>Process Weight Rate (lb/hr)</b>	<b>Allowable Emissions (lb/hr)</b>
ATC-Wood1	900	2.40
ATC-CSWood1	1320	3.10
TNT-PD	1320	3.10

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

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

- (2) The dust collector shall be in operation and control emissions from ATC-CSWood1 operation at all times that ATC-CSWood1 is in operation, in order to comply with this limit. The Permittee shall operate the control device in accordance with the manufacturer's specifications.
  - (3) The portable dust collector shall be in operation and control emissions from TNT-PD at all times that TNT-PD is in operation in order to comply with this limit. The Permittee shall operate the control device in accordance with the manufacturer's specifications. T
- (n) Pursuant to 326 IAC 6-3-1(b)(14), the hand-held metal grinders and saws at this source are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

### Welding Equipment and Plasma Cutting

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(9) and (10), the welding and cutting operations identified as ATC-Weld1 and TNT-Weld1 are exempt from the requirements of 326 IAC 6-3, because each welding station consumes less than 625 pounds per day of welding wire and the each plasma cutting station cuts less than 3,400 inches per hour of stock one (1) inch thickness or less.

### Degreasing Operations

- (p) 326 IAC 8-3-1 (Organic Solvent Degreasing Operations)  
The requirements of 326 IAC 8-3-1 are not applicable to degreasing operations at this source, since degreasing is performed using hand application of solvents.

### Propane-Fired Forklift

- (q) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), each of the propane-fired forklifts are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

### **Testing Requirements**

Testing is not required for any of the operations at this source.

### **Compliance Requirements**

Compliance monitoring is not required for any of the operations at this source.

### **Recommendation**

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 21, 2010.

### **Conclusion**

The operation of this stationary towable cargo trailer manufacturer shall be subject to the conditions of the attached MSOP Renewal No. 039-29706-00639.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Aluminum Trailer Company & TN Trailers, Inc.  
**Address City IN Zip:** 306 South Nappanee Road, Nappanee, Indiana 46550  
**Permit Number:** 039-29706-00639  
**Plt ID:** 039-00639  
**Reviewer:** Bruce Farrar  
**Date:** September 21, 2010

<b>Uncontrolled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Surface Coating	Welding	Working Working Aluminum Cutting	TOTAL
PM	54.59	0.48	16.20	71.27
PM10	54.59	0.48	16.20	71.27
PM2.5	54.59	0.48	16.20	71.27
SO2	-	-	-	0.00
NOx	-	-	-	0.00
VOC	57.55	-	-	57.55
CO	-	-	-	0.00
total HAPs	16.46	0.03	-	16.49
worst case single HAP	8.07	0.03		
	Xylene	Manganese		





**Appendix A: Emission Calculations  
Particulate and HAP Emissions from Welding and Cutting Operations**

**Company Name: Aluminum Trailer Company & TN Trailers, Inc.  
Address City IN Zip: 306 South Nappanee Road, Nappanee, Indiana 46550  
Permit Number: 039-29706-00639  
Pit ID: 039-00639  
Reviewer: Bruce Farrar  
Date: September 21, 2010**

**PTE: Steel and Aluminum Welding Operations: Aluminum Trailer Plant 1**

Type of Welder	Type of Electrode	# of Welding Stations	Electrode Usage Rate (lb/hr/welder)	PM/PM10 Emission Factor (lb PM10/1,000 lb electrode)	Manganese Emission Factor (lb Mn/1,000 lb electrode)	Nickel Emission Factor (lb Ni/1,000 lb electrode)	Chromium Emission Factor (lb Cr/1,000 lb electrode)	PTE of PM/PM10 Uncontrolled (ton/yr)	PTE of Manganese Uncontrolled (ton/yr)	PTE of Nickel Uncontrolled (ton/yr)	PTE of Chromium Uncontrolled (ton/yr)
MIG	ER70S-3	6	1	5.2	0.318	1.00E-03	1.00E-03	0.14	8.4E-03	2.6E-05	2.6E-05
MIG	Al 4043	4	0.25	5.2	0.0026	0	0	0.02	1.1E-05	0.0	0.0
<b>Totals</b>								<b>0.16</b>	<b>8.4E-03</b>	<b>2.6E-05</b>	<b>2.6E-05</b>

**PTE: Steel and Aluminum Welding Operations: TN Trailers**

Type of Welder	Type of Electrode	# of Welding Stations	Electrode Usage Rate (lb/hr/welder)	PM/PM10 Emission Factor (lb PM10/1,000 lb electrode)	Manganese Emission Factor (lb Mn/1,000 lb electrode)	Nickel Emission Factor (lb Ni/1,000 lb electrode)	Chromium Emission Factor (lb Cr/1,000 lb electrode)	PTE of PM/PM10 Uncontrolled (ton/yr)	PTE of Manganese Uncontrolled (ton/yr)	PTE of Nickel Uncontrolled (ton/yr)	PTE of Chromium Uncontrolled (ton/yr)
MIG	ER70S-3	13	1	5.2	0.318	1.00E-03	1.00E-03	0.30	1.8E-02	5.7E-05	5.7E-05
MIG	Al 4043	1	0.25	5.2	0.0026	0	0	0.01	2.8E-06	0.0	0.0
<b>Totals</b>								<b>0.30</b>	<b>1.8E-02</b>	<b>5.7E-05</b>	<b>5.7E-05</b>

Emission factors for ER70S are from AP-42, Tables 12.19-1 and 12.19-2 for welding operations (01/95).  
Emission factors for Al 4043 are from MSDS. Aluminum welding wire is 0.05% manganese by weight. Assume 0.05% of particulate is manganese.

**PTE: Plasma Cutting Operations: Aluminum Trailer Plant 1 and TN Trailers**

Process	Number of Stations	Max. Metal Cutting Rate (in/hr/station)	PM/PM10 Emission Factor (lb/1,000 inches cut)**	PTE of PM/PM10 Uncontrolled (ton/yr)
Plasma Cutting	4	240	0.0039	0.02

\*\*Emission factor for plasma cutting is from the American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 3/16 inch, and the maximum metal thickness is not used in calculating the emissions.  
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in/m) x (1,000 in) = 0.0039 lb/1,000 in cut, 8 mm thick

**Methodology**

PTE Welding Uncontrolled (ton/yr) = # of Welding Stations x Electrode Usage (lb/hr/station) x Emission Factor (lb/1,000 lb electrode) x 8760 hr/yr x 1 ton/2,000 lb  
PTE Cutting Uncontrolled (ton/yr) = # of Stations x Cutting Rate (in/hr/station) x Emission Factor (lb/1,000 in cut) x 8760 hr/yr x 1 ton/2,000 lb

**Appendix A: Emission Calculations  
Particulate Emissions from Woodworking Operations**

**Company Name:** Aluminum Trailer Company & TN Trailers, Inc.  
**Address City IN Zip:** 306 South Nappanee Road, Nappanee, Indiana 46550  
**Permit Number:** 039-29706-00639  
**Plt ID:** 039-00639  
**Reviewer:** Bruce Farrar  
**Date:** September 21, 2010

Operation	Baghouse	Process Weight Rate (lbs/hour)	Capture/Control Efficiency (%)	Saw Chips Collected (gal/wk) <sup>1</sup>	Saw Chips Collected (lb/hr) <sup>1</sup>	PM/PM10 Emissions (lbs/hr) <sup>2</sup>	PTE PM/PM10 Uncontrolled (ton/yr)	PTE PM/PM10 Controlled (lb/hr)	PTE PM/PM10 Controlled (ton/yr)	326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr)
ATC-Wood1 (Aluminum and wood cutting) <sup>3</sup>	none	900	0.0%	-	-	1.06	4.64	1.06	4.64	2.40
TNT-PD (plywood cutting)	dust collector	1320	75.0%	-	-	7.33	32.1	1.83	8.03	3.10
ATC-CSWood1 (wood cutting)	dust collector	1320	95.0%	96.5	16.1	-	70.53	0.81	3.53	3.10

1. Based on reported amount of saw chips collected from woodworking operations from permit M039-24214-00639, issued March 22, 2007. Source operates 8 hours per day, 5 days per week, 26 weeks.
2. Emissions from M039-21926-00639, issued January 24, 2006.
3. Emissions include both aluminum and wood.

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes.

**Methodology**

Sawdust Collected (lb/hour) = gal sawdust collected per week x 6.676 lb sawdust/gal / (8 hours/day x 5 days/week)  
PTE PM/PM10 Uncontrolled (ton/yr) = Sawdust Collected (lb/hour) x 8,760 hr/yr x 1 ton/2,000 lb  
PTE PM/PM10 uncontrolled (ton/yr) = PM/PM10 Emissions (lbs/hr)\*8760 (hr/yr) \* 1 ton/2000 lbs  
PTE PM/PM10 Controlled (lb/hr) = PTE PM/PM10 Uncontrolled (ton/yr) x ( 1 - Capture/Control Efficiency %) x 2000lb/1 ton x 1 yr/8,760 hr  
PTE PM/PM10 Controlled (ton/yr) = PTE PM/PM10 Uncontrolled (ton/yr) x ( 1 - Capture/Control Efficiency %)  
326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr) = 4.1 x (Process Weight Rate (lb/hr)/2000) ^ 0.67



# 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: Thomas Vanderputten  
Aluminum Trailer Co. & Tennessee Trailers, Inc.  
PO Box 396  
Nappanee IN 46550

DATE: Jan. 5, 2011

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

SUBJECT: Final Decision  
MSOP Renewal  
039-29706-00639

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:  
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

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

Jan. 5, 2011

TO: Nappanee Public Library

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

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

**Applicant Name: Aluminum Trailer Co. & TN Trailers, Inc.**  
**Permit Number: 039-29706-00639**

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	BMILLER 1/5/2011 Aluminum Trailer Co & Tennessee Trailers, Inc 039-29706-00639 (final)			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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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											Remarks
1		Thomas Vanderputten Aluminum Trailer Co & Tennessee Trailers, Inc 306 S Nappanee St, PO Box 396 Nappanee IN 46550-396 (Source CAATS) <b>Via Confirm Delivery</b>									
2		Nappanee City Council and Mayors Office P.O. Box 29 Nappanee IN 46550 (Local Official)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
5		Nappanee Public Library 157 N Main St Nappanee IN 46550-1956 (Library)									
6		Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official)									
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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