



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 11, 2012

RE: United Trailers, Inc. / 039-31594-00096

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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**Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY**

**United Trailers, Inc.
19986 CR 8
Bristol, Indiana 46507**

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

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

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

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

| | |
|---|--|
| Operation Permit No.: F039-31594-00096 | |
| Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality | Issuance Date: October 11, 2012 Expiration Date: October 11, 2022 |

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary manufacturing plant for covered cargo trailers.

| | |
|------------------------------|--|
| Source Address: | 19986 CR 8, Bristol, Indiana 46507 |
| General Source Phone Number: | 574-848-7088 |
| SIC Code: | 3715 (Truck Trailers) |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

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

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

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausting to stacks S1, S2 and S3, capacity: 9.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3.
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using High Volume Low Pressure (HVLP) Spray Application, exhausted to general ventilation, capacity: 9.0 trailers per hour.
- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (k) Three (3) Air Makeup Units, with the capacity of 2.57 MMBtu/hr, each, known as Air Makeup Units 1, 2, and 3.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F039-31594-00096, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) All terms and conditions of permits established prior to F039-31594-00096 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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]

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application.

Support information includes the following:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausting to stacks S1, S2 and S3, capacity: 9.0 trailers per hour, consisting of the following equipment:
- (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3.
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using High Volume Low Pressure (HVLP) Spray Application, exhausted to general ventilation, capacity: 9.0 trailers per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied at the one (1) plywood surface coating area, identified as Unit 4, 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.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB1.

D.1.3 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4] [326 IAC 2]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2 (Prevention of Significant Deterioration (PSD)) not applicable, the input of volatile organic compounds (VOCs) delivered to the applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed 98.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.4 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The input of total HAPs delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed a total of 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The input of each single HAP delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source shall limit the source-wide emission of each single HAP and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Unit 2, Unit 2a, Unit 2b, and Unit PB1 shall be controlled by filters for particulate overspray control, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the surface coating operations and their control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and input limitations and HAP input limitations contained in Conditions D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and

“as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Particulate Matter (PM)

In order to comply with Condition D.1.5, the dry filters for particulate matter control shall be in operation at all times when the Unit 2, Unit 2a, Unit 2b, and Unit PB1 are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (V1 and V2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.2, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.2, D.1.3, and D.1.4.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC, worst single HAP and total HAP input for each month; and
 - (5) The total VOC, worst single HAP and total HAP input for each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 and D.1.4 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, exhausting through stack DCV-01, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the particulate matter (PM) emissions (after control) from the woodworking area (Plywood) shall not exceed 3.19 pounds per hour when operating at a process weight rate of 1,376 pounds of wood per hour.

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

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

Compliance with this limit and Condition D.1.5, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total PM emissions to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 PM10 and PM2.5 Emission Limitations [326 IAC 2-8] [326 IAC 2-2]

The PM10 and PM2.5 emissions (after control) from the woodworking area (Plywood), shall be less than 18.04 pounds per hour.

Compliance with these limits and Condition D.1.5, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total PM10 and PM2.5 emissions to less than 100 tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the surface coating operations and their control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclone for PM, PM10, and PM2.5 control shall be in operation and control emissions from the woodworking equipment at all times that woodworking equipment is in operation.

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the woodworking area (Plywood) stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.2.7 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain a record of the daily visible emission notations of the Plywood stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (c) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

The particulate matter (PM) from the brazing equipment, cutting torches, soldering equipment, welding equipment shall be limited by the following equation:

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:

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: United Trailers, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
FESOP Permit No.: F039-31594-00096

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: United Trailers, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
FESOP Permit No.: F039-31594-00096

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: United Trailers, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F039-31594-00096
Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB1, and the one (1) plywood surface coating area, identified as Unit 4
Parameter: Total VOC Input
Limit: The input of volatile organic compounds (VOCs) delivered to the applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed 98.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Total VOC Input (tons) | Total VOC Input (tons) | Total VOC Input (tons) |
|-------|------------------------|------------------------|------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: United Trailers, Inc.
 Source Address: 19986 County Road 8, Bristol, Indiana 46507
 FESOP No.: F039-31594-00096
 Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4
 Parameter: Worst Single HAP Input
 Limit: The input of each single HAP delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Worst Single HAP Input (tons) | Worst Single HAP Input (tons) | Worst Single HAP Input (tons) |
|-------|-------------------------------|-------------------------------|-------------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: United Trailers, Inc.
 Source Address: 19986 County Road 8, Bristol, Indiana 46507
 FESOP No.: F039-31594-00096
 Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4
 Parameter: Total HAP Input
 Limit: The input of total HAPs delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed a total of 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Total HAP Input (tons) | Total HAP Input (tons) | Total HAP Input (tons) |
|-------|------------------------|------------------------|------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Source Name: United Trailers, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
FESOP Permit No.: F039-31594-00096

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

ATTACHMENT A
F 039-31594-00096
FUGITIVE PARTICULATE MATTER EMISSION CONTROL PLAN

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions will be controlled according to the following plan for United Trailers, Inc., a covered cargo trailer manufacturing source.

- 1) Current Source Address:
19986 County Road 8, Bristol, Indiana 46507
- 2) Name of Operator Responsible:
Director of Human Resources and EH&S for United Trailers, Inc.
- 3) Points that have a potential to emit:
Unpaved Roads and Storage Areas

Unpaved roads and storage areas at the source shall be coated with water, as necessary, for dust control to prevent fugitive dust generated from vehicle travel from crossing off United Trailers, Inc. property.

Records shall be kept which will identify the atmospheric conditions, general maintenance activities, and visible observation made in accordance with this fugitive dust control plan. A log of this information shall be kept and made available to regulatory officials upon request. The following information shall be included with each log entry:

Unpaved Roads and Storage Areas

- (1) Name of employee conducting visible observations
- (2) Dates and times when water is applied
- (3) Dates and times of visible observations

In the event that adverse meteorological conditions arise, appropriate control measures shall be implemented. The unpaved road usage activities will be discontinued if conditions exist that will not allow for the comprehensive control of visible particulate matter generated from these activities. These instances shall be noted in the monitoring log.

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

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

Source Background and Description

| | |
|------------------------------|---|
| Source Name: | United Trailers, Inc. |
| Source Location: | 19986 CR 8, Bristol, Indiana 46507 |
| County: | Elkhart |
| SIC Code: | 3715 (Truck Trailers) |
| Operation Permit No.: | F039-31594-00096 |
| Permit Reviewer: | Brian Wright |

On September 5, 2012, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that United Express Line, Inc. had applied for a renewal of their FESOP. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On September 24, 2012, United Trailers, Inc. submitted comments to IDEM, OAQ on the draft FESOP Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The source requested that the company name be changed from United Express Line, Inc. to United Trailers, Inc. All other company information has remained the same.

Response to Comment 1:

IDEM agrees with the recommended changes. The permit has been revised as follows:

United Trailers, Inc.
~~United Express Line, Inc.~~

IDEM Contact

- (a) Questions regarding this proposed FESOP Renewal can be directed to Brian Wright 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) 317-234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the permit 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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

| | |
|----------------------------|--------------------------------------|
| Source Name: | United Express Line, Inc. |
| Source Location: | 19986 CR 8, Bristol, IN 46507 |
| County: | Elkhart |
| SIC Code: | 3715 (Truck Trailers) |
| Permit Renewal No.: | F039-31594-00096 |
| Permit Reviewer: | Brian Wright |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from United Express Line, Inc. relating to the continued operation of a stationary manufacturing plant for covered cargo trailers. On March 9, 2012, United Express Line, Inc. submitted an application to the OAQ requesting to renew its operating permit. United Express Line, Inc. was issued its first FESOP Renewal F039-21832-00096 on December 17, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausted to vents V1 and V2, capacity: 9.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with dry filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with dry filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with dry filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3; and
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using rollers to apply coating and exhausted to the general ventilation, capacity: 9.0 trailers per hour.
- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, exhausting through stack DCV-01, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. The total heat input capacity at this source is less than 10 million British thermal units per hour (MMBtu/hr) and there are no boilers.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

- (a) Significant Permit Revision No. 039-22535-00096 issued on April 5, 2007; and
- (b) Administrative Amendment No. 039-24589-00096 issued on June 4, 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.

Enforcement Issue

There are no enforcement actions pending.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgement was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (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 were 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 from the woodworking area was calculated after consideration of the controls for purposes of determining permit level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking area was calculated before consideration of the controls.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

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

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

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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_x 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_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) after integral woodworking controls of PM₁₀, PM_{2.5}, and VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM₁₀ and VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater 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 equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

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

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | | |
|-----------------------------------|--|--------------------|----------------------|-----------------|-----------------|--------------|-------------|--------------|--------------|--------------------|
| | PM | PM ₁₀ * | PM _{2.5} ** | SO ₂ | NO _x | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Surface Coating Operations | 10.72 | 10.72 | 10.72 | 0.00 | 0.00 | 98.00 | 0.00 | 0 | 24.00 | 9.90 Xylene |
| Natural Gas Combustion | 0.08 | 0.33 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 | 5,288 | 0.083 | 0.08 Hexane |
| Woodworking*** | 7.68 | 7.68 | 7.68 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 |
| Welding-Thermal Cutting | 4.84 | 4.84 | 4.84 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.14 | 0.14 Mn |
| Total PTE of Entire Source | 23.32 | 23.57 | 23.57 | 0.03 | 4.38 | 98.24 | 3.68 | 5,288 | 24.22 | 9.90 Xylene |

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | | |
|---------------------------------|--|--------------------|----------------------|-----------------|-----------------|-----|-----|---------------------------|------------|------------------|
| | PM | PM ₁₀ * | PM _{2.5} ** | SO ₂ | NO _x | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 CO ₂ e | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | 100,000 CO ₂ e | NA | NA |

*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".
 **PM_{2.5} listed is direct PM_{2.5}.
 ***After integral woodworking controls

(a) FESOP and PSD Minor Source Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs shall be limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

This existing source is not a major stationary source under PSD (326 IAC 2-2), because the potential to emit PM is limited to 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 requirement do not apply

(1) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(A) PM emissions (after control) from the woodworking operation (Plywood) shall not exceed 3.19 pounds per hour

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total PM emissions to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

(B) PM10 and PM2.5 emissions (after control) from the woodworking operation (Plywood) shall each not exceed 18.04 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total PM10 and PM2.5 emissions to less than 100 tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(C) The input of VOC delivered to the applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including clean up solvents, shall not exceed 98 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

- (D) The input of total HAPs delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed a total of 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance this limit, combined with the potential to emit HAPs from all other emission units at this source shall limit the source-wide total HAP emissions to less than 25 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

- (E) The input of each single HAP delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1, and Unit 4, including cleanup solvents, shall not exceed 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at this source shall limit the source-wide total emission of each single HAP to less than 10 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Surface Coating of Metal Furniture, 40 CFR 60.310 through 60.316, Subpart EE (326 IAC 12), are not included in the permit for the paint shop operation. The source manufactures covered cargo trailers, not metal furniture.
- (b) The requirements of the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390 through 60.398, Subpart MM (326 IAC 12), are not included in the permit for the paint shop operation. The source manufactures covered cargo trailers, not automobiles and/or Light-Duty Trucks as defined in 40 CFR 60.391.20.
- (c) The requirements of the New Source Performance Standards for Industrial Surface Coating: Large Appliances, 40 CFR 60.450 through 60.456, Subpart SS (326 IAC 12), are not included in the permit for the paint shop operation. The source manufactures covered cargo trailers, not large appliances.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Halogenated Solvent Cleaning, (40 CFR 63, Subpart T) (326 IAC 20-6), are not included in the permit because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-duty Trucks, 40 CFR 63, Subpart IIII (63.3080 through 63.3174) (326 IAC 20-85), are not included in the permit for the paint shop operation. The source manufactures covered cargo trailers, not automobiles or light-duty trucks as defined in 40 CFR 63.3176.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (63.3880 through 63.3981) (326 IAC 20-88), are not included in the permit for the paint shop operation because it is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included in the permit for the paint shop operation because this source is not a major source of HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Large Appliance, 40 CFR 63, Subpart NNNN (63.4080 through 63.4181) (326 IAC 20-63), are not included in the permit for the paint shop operation because this source manufactures covered cargo trailers, not large appliances, and this source is not a major source of HAPs.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (63.4880 through 63.4981) (326 IAC 20-78), are not included in the permit for the paint shop operation because this source manufactures covered cargo trailers, not metal furniture, and this source is not a major source of HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180), are not included in this permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not refinish mobile equipment, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to plastic and/or metal substrates.
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 2-8-4 (FESOP)

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

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

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

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

This source is limited to emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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.

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.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The Permittee submitted a Fugitive Dust Control Plan on September 27, 2007. The plan consists of coating unpaved roads and storage areas with water, as necessary, for dust control to prevent fugitive dust from crossing the property line (see Attachment A).

State Rule Applicability – Individual Facilities

Surface Coating

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

- (1) Unit 1 and Unit 3 are not subject to the requirements of 326 IAC 6-3-2, since they do not emit particulate.
- (2) The surface coating process used at Unit 4 are coatings that are applied with roll coaters. Therefore, pursuant to 326 IAC 6-3-1(b)(6), Unit 4 is exempt from the requirements of 326 IAC 6-3-2.
- (3) Pursuant to 326 IAC 6-3-1(b)(15), the surface coating processes at Units 2, 2a, 2b and PB1 are each subject to the requirements of 326 IAC 6-3, since they each have the potential to use equal to or greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2(d)(1), the surface coating processes at Units 2, 2a, 2b and PB1 in the paint shop shall be controlled by dry particulate filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The surface coating operations at this source are regulated by 326 IAC 8-2 therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The covered cargo trailers manufactured at this source are not passenger cars or passenger car derivatives. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

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

The one (1) paint shop (Units 1, 2, 2a, 2b, 3 and PB1) is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day, and includes surface coating of metal parts or products under the Standard Industrial Classification Code of major group #37.

Pursuant to 326 IAC 8-2-9, (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators at the one (1) paint shop (Units 1, 2, 2a, 2b, 3 and PB1) shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings.

Based on the MSDS submitted by the source and calculations made, each of the spray booth (Units 1, 2, 2a, 2b, 3 and PB1) is in compliance with this requirement.

The surface coating operations at the one plywood surface coating area, identified as Unit 4, is not subject to 326 IAC 8-2-9, since it is subject to the requirements of 326 IAC 8-2-12.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source does not coat any flat wood panels that are considered printed panels, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes. Therefore, the requirements of 326 IAC 8-2-10 are not applicable.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The surface coating operations at the one plywood surface coating area, identified as Unit 4, applies coating to solid wood or wood compositions. The one (1) plywood surface coating area, identified as Unit 4, was constructed after July 1, 1990, and has actual VOC emissions greater than fifteen (15) pounds per day. Therefore, the one (1) plywood surface coating area, identified as Unit 4, is subject to the requirements of 326 IAC 8-2-12.

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets 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.

Unit 4 uses HVLP spray application and is in compliance with this rule.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This source was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Woodworking

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

Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the one (1) woodworking area, identified as Plywood, since it has potential particulate emissions (after integral woodworking controls) of greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the particulate from the one (1) woodworking area, identified as Plywood, shall be limited to 3.19 pounds per hour when operating at a process weight rate of 1,376 pounds of wood per hour.

The limited emission rate is based upon the following:

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:

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

The cyclone shall be in operation at all times the woodworking operation (Plywood) is in operation, in order to comply with this limit.

Insignificant Activities

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The air make-up units are not sources of indirect heating. Therefore, 326 IAC 6-2-1 does not apply to the air make-up units.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

The welding and torch cutting units are below the exemption levels as specified in 326 IAC 6-3-1(b) (9) and (10). Therefore, 326 IAC 6-3-1 does not apply to the welding and torch cutting units.

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

As initially required by F039-11645-00096, issued on June 25, 2001, the particulate matter (PM) from the brazing equipment, cutting torches, soldering equipment, welding equipment shall be limited by the following:

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

| |
|---|
| Compliance Determination and Monitoring Requirements |
|---|

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

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

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

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|---|---|-----------|---|----------------------------|
| Paint Shop (Vents V1 and V2) Dry filters | Integrity and Particulate Loading Inspections | Daily | Normal or Abnormal | Response Steps |
| | Overspray Observations | Weekly | Presence of overspray | |
| | Stack Inspections | Monthly | Noticeable change or presence of overspray on rooftop or on ground nearby | |
| Woodworking (Plywood) Cyclone | Visible Emissions | Daily | Normal or Abnormal | Response Steps |
| | Cyclone Inspections | Quarterly | Normal or Abnormal | |

These monitoring conditions are necessary because dry filters for the Paint Shop (2a, 2b and PB1) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

These monitoring conditions are necessary because the woodworking (Plywood) operation must operate properly to ensure compliance with 326 IAC 6-3, (Process Operations), 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Recommendation

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

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

An application for the purposes of this review was received on March 9, 2012.

Conclusion

The operation of this stationary manufacturing plant for covered cargo trailers shall be subject to the conditions of the attached FESOP Renewal No. F039-31594-00096.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright**

Unlimited/Uncontrolled Potential to Emit

| Emission Units | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | TOTAL HAPs | Single Highest HAP |
|----------------------------|---------------|------------------|-------------------|-----------------|-------------|---------------|-------------|---------------------------|---------------|---------------------|
| Surface Coating Operations | 214.33 | 214.33 | 214.33 | 0.00 | 0.00 | 282.36 | 0.00 | 0.00 | 100.67 | 45.45 Xylene |
| Natural Gas Combustion | 0.08 | 0.33 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 | 5,288 | 0.08 | 0.08 Hexane |
| Woodworking | 768.22 | 768.22 | 768.22 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Welding-Thermal Cutting | 4.97 | 4.97 | 4.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.22 | 0.22 Manganese |
| Totals | 987.60 | 987.85 | 987.85 | 0.03 | 4.38 | 282.60 | 3.68 | 5,288 | 100.97 | 45.45 Xylene |

Unlimited Potential to Emit (After Integral Woodworking Controls - Permit Level Determination)*

| Emission Units | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | TOTAL HAPs | Single Highest HAP |
|----------------------------|---------------|------------------|-------------------|-----------------|-------------|---------------|-------------|---------------------------|---------------|---------------------|
| Surface Coating Operations | 214.33 | 214.33 | 214.33 | 0.00 | 0.00 | 282.36 | 0.00 | 0.00 | 100.67 | 45.45 Xylene |
| Natural Gas Combustion | 0.08 | 0.33 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 | 5,288 | 0.08 | 0.08 Hexane |
| Woodworking* | 7.68 | 7.68 | 7.68 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 |
| Welding-Thermal Cutting | 4.97 | 4.97 | 4.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.22 | 0.22 Manganese |
| Totals | 227.06 | 227.31 | 227.31 | 0.03 | 4.38 | 282.60 | 3.68 | 5,288 | 100.97 | 45.45 Xylene |

Limited Potential to Emit (After Integral Woodworking Controls)

| Emission Units | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | TOTAL HAPs | Single Highest HAP |
|----------------------------|--------------|------------------|-------------------|-----------------|-------------|--------------|-------------|---------------------------|--------------|--------------------|
| Surface Coating Operations | 10.72 | 10.72 | 10.72 | 0.00 | 0.00 | 98.00 | 0.00 | 0.00 | 24.00 | 9.90 Xylene |
| Natural Gas Combustion | 0.08 | 0.33 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 | 5,288 | 0.08 | 0.08 Hexane |
| Woodworking* | 13.98 | 79.02 | 79.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Welding-Thermal Cutting | 4.97 | 4.97 | 4.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.22 | 0.22 Manganese |
| Totals | 29.74 | 95.03 | 95.03 | 0.03 | 4.38 | 98.24 | 3.68 | 5,288 | 24.30 | 9.90 Xylene |

*In October 1993 a Final Order Granting Summary Judgement was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (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 were 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 from the woodworking area was calculated after consideration of the controls for purposes of determining permit level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking area was calculated before consideration of the controls.

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

Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Material (gal/unit) | Maximum (unit/hour) | Maximum (gal/day) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Transfer Efficiency* | Uncontrolled PM/PM10/PM2.5 Potential (ton/yr) | lb VOC/gal solids | Control Efficiency | Controlled PM/PM10/PM2.5 Potential (ton/yr) | |
|---|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|----------------------------|---------------------|-------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|----------------------|---|-------------------|--------------------|---|--|
| Unit 1 | | | | | | | | | | | | | | | | | | | | |
| Toluene | 7.25 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.08000 | 9.000 | 17.3 | 7.25 | 7.25 | 5.22 | 125.28 | 22.86 | 100% | 0.00 | n/a | 0% | 0.00 | |
| Unit 4 General Ventilation | | | | | | | | | | | | | | | | | | | | |
| Roof Adhesive/Sealer | 9.76 | 2.97% | 0.0% | 3.0% | 0.0% | 97.00% | 0.20500 | 9.000 | 44.3 | 0.29 | 0.29 | 0.53 | 12.84 | 2.34 | 100% | 0.00 | 0.30 | 0% | 0.00 | |
| Silicone Sealer | 8.68 | 4.03% | 0.0% | 4.0% | 0.0% | 95.00% | 0.20500 | 9.000 | 44.3 | 0.35 | 0.35 | 0.65 | 15.49 | 2.83 | 100% | 0.00 | 0.37 | 0% | 0.00 | |
| Russel Spray Adhesive | 6.60 | 80.00% | 0.0% | 80.0% | 0.0% | 0.00% | 0.01500 | 9.000 | 3.2 | n/a | 5.28 | 0.71 | 17.11 | 3.12 | 100% | 0.00 | n/a | 0% | 0.00 | |
| Unit 2 | | | | | | | | | | | | | | | | | | | | |
| Alkyd FD Gray Primer | 13.69 | 20.11% | 0.0% | 20.1% | 0.0% | 59.46% | 0.15000 | 9.000 | 32.4 | 2.75 | 2.75 | 3.72 | 89.20 | 16.28 | 75% | 16.17 | 4.63 | 95% | 0.81 | |
| Unit 2a | | | | | | | | | | | | | | | | | | | | |
| FD 35 Black Enamel | 9.16 | 37.54% | 0.0% | 37.5% | 0.0% | 50.54% | 0.89000 | 9.000 | 192.2 | 3.44 | 3.44 | 27.54 | 661.05 | 120.64 | 75% | 50.18 | 6.80 | 95% | 2.51 | |
| Unit 2b | | | | | | | | | | | | | | | | | | | | |
| Undercoat | 11.52 | 18.02% | 5.0% | 13.0% | 4.6% | 92.00% | 1.59000 | 9.000 | 343.4 | 1.57 | 1.50 | 21.46 | 515.13 | 94.01 | 75% | 147.98 | 1.63 | 95% | 7.40 | |
| Clean Up | | | | | | | | | | | | | | | | | | | | |
| Unit 3 Gun Cleaning | | | | | | | | | | | | | | | | | | | | |
| Mineral Spirits | 6.43 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.08000 | 9.000 | 17.3 | 6.43 | 6.43 | 4.63 | 111.11 | 20.28 | 100% | 0.00 | n/a | 0% | 0.00 | |
| Uncontrolled/Unlimited PTE = | | | | | | | | | | | | 64.47 | 1547.20 | 282.36 | 214.33 | | | | | |
| Uncontrolled/Limited PTE of VOCs (tons/yr) = | | | | | | | | | | | | 98.00 | | | | | | | | |

*Transfer Method = High Volume, Low Pressure (HVLP) Spray and Hand Application

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Unit 1 + Worst Case Coating Unit 2 + Unit 3 + Unit 4
PM Control Efficiency is 95%

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

**Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % MIBK | Weight % Ethyl Benzene | Weight % Toluene | Xylene Emissions (tons/yr) | MIBK Emissions (tons/yr) | Ethyl Benzene (tons/yr) | Toluene Emissions (tons/yr) |
|-----------------------------------|-------------------|--------------------------------|---------------------|-----------------|---------------|------------------------|------------------|----------------------------|--------------------------|-------------------------|-----------------------------|
| Unit 1 | | | | | | | | | | | |
| Toluene | 7.25 | 0.08 | 9.00 | 0.00% | 0.00% | 0.00% | 100.00% | 0.00 | 0.00 | 0.00 | 22.86 |
| Unit 4 General Ventilation | | | | | | | | | | | |
| ADSeal | 9.76 | 0.21 | 9.00 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Silicone Sealer | 8.68 | 0.20500 | 9.00 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Russel Spray Adhesive | 6.6 | 0.01500 | 9.00 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Unit 3 | | | | | | | | | | | |
| Mineral Spirits | 6.43 | 0.08000 | 9.00 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Unit 2 | | | | | | | | | | | |
| Primer AD Gray | 13.69 | 0.15 | 9.00 | 6.08% | 0.00% | 1.11% | 0.00% | 4.92 | 0.00 | 0.90 | 0.00 |
| Unit 2a | | | | | | | | | | | |
| FD35 Black Enamel | 9.16 | 0.89 | 9.00 | 12.61% | 6.70% | 3.09% | 0.00% | 40.52 | 21.53 | 9.93 | 0.00 |
| Unit 2b | | | | | | | | | | | |
| Undercoat | 11.52 | 1.59 | 9.00 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 |
| Individual Totals | | | | | | | | 45.45 | 21.53 | 10.83 | 22.86 |

| | |
|----------------------------|---------------|
| Total HAPs | 100.67 |
| Limited Single HAPs | 9.90 |
| Limited Total HAPs | 24.00 |

METHODOLOGY

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

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

Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright

| | | |
|---------------------------------|-----------------------|---------------------------------|
| Heat Input Capacity MMBtu/hr | HHV mmBtu mmscf | Potential Throughput MMCF/yr |
| 10.00 | 1000 | 87.60 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|------|--------------------|------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.90 | 7.60 | 7.60 | 0.60 | 100 **see below | 5.50 | 84 |
| Potential Emission in tons/yr | 0.08 | 0.33 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

| Emission Factor in lb/MMc | HAPs - Organics | | | | |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 9.2E-05 | 5.3E-05 | 3.3E-03 | 0.08 | 1.5E-04 |

| Emission Factor in lb/MMc | HAPs - Metals | | | | |
|-------------------------------|---------------|---------|----------|-----------|---------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 2.2E-05 | 4.8E-05 | 6.1E-05 | 1.7E-05 | 1.5E-04 |

Total HAPs = 0.08

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

| Emission Factor in lb/MMcf | Greenhouse Gas | | |
|---------------------------------------|----------------|------|------|
| | CO2 | CH4 | N2O |
| | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 5,256 | 0.10 | 0.10 |
| Summed Potential Emissions in tons/yr | 5,256 | | |
| CO2e Total in tons/yr | 5,288 | | |

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations
Baghouse Operations**

**Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright**

| Unit ID | Control Efficiency (%) | Grain Loading per Actual Cubic foot of Outlet Air (grains/ft3) | Gas or Air Flow Rate (acfm) | PM/PM10/PM2.5 before Controls (lb/hr) | PM/PM10/PM2.5 before Controls (tons/yr) | PM/PM10/PM2.5 after Controls* (lb/hr) | PM/PM10/PM2.5 after Controls* (tons/yr) |
|---------|------------------------|--|-----------------------------|---------------------------------------|---|---------------------------------------|---|
| Plywood | 99.0% | 0.1044 | 1960.0 | 175.39 | 768.22 | 1.75 | 7.68 |

| | Limited Control Efficiency | Limited PTE (lbs/hr) | Limited PTE (tons/yr) |
|-------|----------------------------|----------------------|-----------------------|
| PM | 98.18% | 3.19 | 13.98 |
| PM10 | 89.71% | 18.04 | 79.02 |
| PM2.5 | 89.71% | 18.04 | 79.02 |

Methodology

PM/PM10/PM2.5 after controls (lbs/hr) = [(Outlet Grain Loading (grains/ft3)) * [Flow Rate (acfm)] * [60 min/hr] * [lb/7000 grains]
PM/PM10/PM2.5 after controls (tons/yr) = [PM/PM10/PM2.5 after controls (lbs/hr)] * (8760 hr/yr) * (ton/2000 lb

PM/PM10/PM2.5 before controls (lbs/hr) = [PM/PM10/PM2.5 after controls (lbs/hr)] / (1-control efficiency)
PM/PM10/PM2.5 before controls (tons/yr) = [PM/PM10/PM2.5 before controls (lbs/hr)] * (8760 hr/yr) * (ton/2000 lb

326 IAC 6-3-2 Allowable Rate of Emissions

| Unit ID | Process Rate (lbs/hr) | Process Weight Rate (tons/hr) | Allowable Emissions (lbs/hr) |
|---------|-----------------------|-------------------------------|------------------------------|
| Plywood | 1376 | 0.688 | 3.19 |

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

*In October 1993 a Final Order Granting Summary Judgement was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (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 were 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 from the woodworking area was calculated after consideration of the controls for purposes of determining permit level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking area was calculated before consideration of the controls.

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

**Company Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Permit No: F039-31594-00096
Reviewer: Brian Wright**

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|-------------------------------------|--------------------|---|--------------------------------------|---|--------|--------|--------|-----------------------|----------|----------|----------|------------------|
| | | | | PM/PM10/ PM2.5 | Mn | Ni | Cr | PM/PM10/ PM2.5 | Mn | Ni | Cr | |
| WELDING | | | | | | | | | | | | |
| Metal Inert Gas (MIG)(carbon steel) | 10 | 5 | | 0.0055 | 0.0005 | | | 0.275 | 0.025 | 0.0 | 0.0 | 0.025 |
| Metal Inert Gas (MIG)(carbon steel) | 10 | 5 | | 0.0055 | 0.0005 | | | 0.275 | 0.025 | 0.0 | 0.0 | 0.025 |
| | | | | | | | | | | | | |
| FLAME CUTTING | Number of Stations | Max. Metal Thickness Cut (in.) | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)** | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
| | | | | PM/PM10/ PM2.5 | Mn | Ni | Cr | PM/PM10/ PM2.5 | Mn | Ni | Cr | |
| Oxyacetylene Cutting | 5 | 1 | 12 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.584 | 5.84E-05 | 5.84E-09 | 1.46E-13 | 5.84E-05 |

EMISSION TOTALS

| | | | | | PM/PM10/ PM2.5 | Mn | Ni | Cr | HAPs |
|--------------------------------------|--|--|--|--|-------------------|-------------|-----------------|-----------------|-------------|
| Potential Emissions lbs/hr | | | | | 1.13 | 0.05 | 5.84E-09 | 1.46E-13 | 0.05 |
| Potential Emissions lbs/day | | | | | 27.2 | 1.20 | 1.40E-07 | 3.50E-12 | 1.20 |
| Potential Emissions tons/year | | | | | 4.97 | 0.22 | 2.56E-08 | 6.39E-13 | 0.22 |

METHODOLOGY

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

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

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

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

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

negl. = negligible



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

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

TO: Jared Hochstettler
United Trailers, Inc.
19986 CR 8
Bristol, IN 46507

DATE: October 11, 2012

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

SUBJECT: Final Decision
FESOP Renewal
039-31594-00096

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:
Nate Black – D&B Environmental Services, Inc.
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

| | | | | |
|----------------------------|---|---|------------------------------------|--|
| IDEM Staff | GHOTOPP 10/11/2012 United Trailers, Inc. 039-31594-00096 Final | | CERTIFICATE OF MAILING ONLY | 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 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|--|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Jared Hochstettler United Trailers, Inc. 19986 CR 8 Bristol IN 46507 (Source CAATS) via confirmed delivery | | | | | | | | | | |
| 2 | | Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official) | | | | | | | | | | |
| 3 | | Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department) | | | | | | | | | | |
| 4 | | Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official) | | | | | | | | | | |
| 5 | | Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official) | | | | | | | | | | |
| 6 | | Nate Black D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant) | | | | | | | | | | |
| 7 | | Bristol Washington Township Public Library 505 West Vistula Street Bristol IN 46507-0789 (Library) | | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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