



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

TO: Interested Parties / Applicant

DATE: December 2, 2013

RE: Stealth Enterprises, LLC/039-33515-00716

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.dot 6/13/13



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Stuart Keaton  
Stealth Enterprises, LLC.  
907 South Division Street  
Bristol, Indiana 46507

December 2, 2013

Re: 039-33515-00716  
First Significant Revision to  
M039-31078-00716

Dear Mr. Keaton:

Stealth Enterprises, LLC. was issued a Minor Source Operating Permit (MSOP) No. M039-31078-00716 on February 17, 2012 for a stationary cargo trailer manufacturing operation located at 907 S. Division St, Bristol, IN 46507. On August 12, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to relocate an existing cargo trailer assembly line to a new building on the same site and add two (2) new cargo trailer assembly lines. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Doug Logan of my staff at 317-234-5328 or 1-800-451-6027, and ask for extension 4-5328.

Sincerely,

Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA/dl

cc: File - Elkhart County  
Elkhart County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Northern Regional Office



A State that Works



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Thomas W. Easterly  
Commissioner

**New Source Construction and Minor Source Operating  
Permit  
OFFICE OF AIR QUALITY**

**Stealth Enterprises, LLC  
907 South Division St.  
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.

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

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

Operation Permit No.: 039-31078-00716	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 17, 2012  Expiration Date: February 17, 2017

Significant Permit Revision No.: 039-33515-00716	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 2, 2013  Expiration Date: December 2, 2018

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## SECTION A SOURCE SUMMARY

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

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

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

Source Address:	907 South Division St., Bristol, Indiana 46507
General Source Phone Number:	(574) 848-5900
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### Plant 1

- (a) One (1) cargo trailer assembly line, identified as A1, constructed in September 2009, approved in 2013 for modification, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.
- (b) Two (2) cargo trailer assembly lines, collectively identified as A2, approved in 2013 for construction, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.
- (c) Seven (7) natural gas-fired radiant tube heaters, identified as A3-A9, approved in 2013 for construction, with a combined maximum heat input rating of 1.3 MMBtu/hr, exhausting indoors.

#### Plant 2

- (d) Seven (7) MIG welding operations, identified as W1-W7, installed in 2009, exhausting indoors.
- (e) One (1) plasma cutting operations, identified as PC, installed in 2001, with a maximum capacity of cutting metal thickness of 0.25 inches and 56 inches per minute, exhausting indoors.

#### Plant 4

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack

SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.

#### Miscellaneous

- (g) Eleven (11) natural gas fired radiant tube heaters, identified as Plant 2, 3, & 4 combustion units (formerly H1-H8), installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.
- (h) Three (3) natural gas fired air make up units, identified as Plant 2, 3, & 4 combustion units (formerly H9-H11), installed in September 2009, with a combined maximum heat input rate of 1.4 MMBtu per hour, exhausting indoors.
- (i) Paved and unpaved roads and parking lots with public access.

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M 039-31078-00716, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.6 Enforceability**

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M 039-31078-00716 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.19 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.20 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

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

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

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

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

## **Corrective Actions and Response Steps**

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

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);  
or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall record the reasonable response steps taken.

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

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

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

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

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

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

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

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

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Plant 1

- (a) One (1) cargo trailer assembly line, identified as A1, constructed in September 2009, approved in 2013 for modification, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.
- (b) Two (2) cargo trailer assembly lines, collectively identified as A2, approved in 2013 for construction, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.

#### Plant 4

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.

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

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

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

- (a) 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 applied to metal parts, excluding water, as delivered to the applicator
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Plant 1 and Plant 4 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

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- (a) Particulate from Plant 4 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.4 Particulate [326 IAC 6-3]

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In order to render the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) not applicable, the cargo trailer assembly lines, located in Plant 1, shall use less than 5 gallons of spray-applied adhesive per day.

Compliance with the above limit shall render the requirements 326 IAC 6-3-2(d) not applicable to the cargo trailer assembly lines (Plant 1).

#### D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.1.6 Volatile Organic Compounds

---

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) 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.

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

#### D.1.7 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits for coatings applied to metal parts established in Condition

D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

- (1) The VOC 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.
- (b) To document the compliance status with Conditions D.1.4, the Permittee shall maintain records in accordance with (1) below. Records maintained shall be complete and sufficient to establish compliance with the coating usage limit established in Conditions D.3.1.
  - (a) The amount of coating material used on daily basis.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Plant 1

- (c) Seven (7) natural gas-fired radiant tube heaters, identified as A3-A9, approved in 2013 for construction, with a combined maximum heat input rating of 1.3 MMBtu/hr, exhausting indoors.

#### Miscellaneous

- (g) Eleven (11) natural gas fired radiant tube heaters, identified as Plant 2, 3, & 4 combustion units (formerly H1-H8), installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.

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

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

#### D.2.1 Particulate Emissions Limitation [326 IAC 6-2-4]

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Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from radiant tube heater shall be limited to 0.6 pounds per MMBtu heat input.

**Section E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]**

**Operation Description:**

Plant 4

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.

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

**E.1.1 General Provisions Relating to NESHAP HHHHHH [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR 63, Subpart HHHHHH, in accordance with the schedule in 40 CFR 63, Subpart HHHHHH.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit), as specified as follows:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170
- (3) 40 CFR 63.11171
- (4) 40 CFR 63.11172(a)(2)
- (5) 40 CFR 63.11173(e), (f), and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177
- (10) 40 CFR 63.11178

Permit Reviewer: Renee Traivaranon

- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1 to Subpart HHHHHH

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Stealth Enterprises, LLC
<b>Address:</b>	907 South Division St.
<b>City:</b>	Bristol, Indiana 46507
<b>Phone #:</b>	(574) 848-5900
<b>MSOP #:</b>	M039-33515-00716

I hereby certify that Stealth Enterprises, LLC is :

still in operation.

I hereby certify that Stealth Enterprises, LLC is :

no longer in operation.

in compliance with the requirements of MSOP M039-33515-00716.

not in compliance with the requirements of MSOP M039-33515-00716.

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

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

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

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

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

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

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

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

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

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

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

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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

Stealth Enterprises, LLC  
907 South Division St.  
Bristol, Indiana 46507

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Stealth Enterprises, LLC 907 S. Division Street, Bristol, Indiana 46507, completed construction of the on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 28, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M 039-31078-00716, Plant ID No. 03-00716 issued on February 17, 2012.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_ .

My Commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

**Attachment A**  
**To MSOP No.: 039-33515-00716**

[Downloaded from the eCFR on July 1, 2013]

**Electronic Code of Federal Regulations**

**Title 40: Protection of Environment**

**40 CFR 63, Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

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

**What This Subpart Covers**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) Mixing rooms and equipment;

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

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

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

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

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

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

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

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

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

### **General Compliance Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

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

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

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

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

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

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

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

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

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

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see § 63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Notifications, Reports, and Records**

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

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

(1) The company name, if applicable.

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

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

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

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

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

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

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

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

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's

name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in § 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

### **Other Requirements and Information**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing

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

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

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

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

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

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

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

*Painter* means any person who spray applies coating.

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

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

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

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

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

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

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

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

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

- (1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

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

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

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

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

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

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

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§ 63.1(a)(1)-(12)	General Applicability	Yes	
§ 63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in § 63.11170.
§ 63.1(c)(1)	Applicability After Standard Established	Yes	
§ 63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.1(c)(5)	Notifications	Yes	
§ 63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.2	Definitions	Yes	Additional definitions are specified in § 63.11180.
§ 63.3(a)-(c)	Units and Abbreviations	Yes	
§ 63.4(a)(1)-(5)	Prohibited Activities	Yes	
§ 63.4(b)-(c)	Circumvention/Fragmentation	Yes	
§ 63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§ 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§ 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(e)(1)-(2)	Operation and Maintenance	Yes	
§ 63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§ 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§ 63.6(f)(2)-(3)	Methods for Determining Compliance	Yes	
§ 63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§ 63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§ 63.6(i)(1)-(16)	Extension of Compliance	Yes	
§ 63.6(j)	Presidential Compliance Exemption	Yes	
§ 63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§ 63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§ 63.9(a)-(d)	Notification Requirements	Yes	§ 63.11175 specifies notification requirements.
§ 63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§ 63.9(f)	Notification of Visible Emissions/Opaity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§ 63.9(h)	Notification of Compliance Status	No	§ 63.11175 specifies the dates and required content for submitting the notification of compliance status.
§ 63.9(i)	Adjustment of Submittal Deadlines	Yes	
§ 63.9(j)	Change in Previous Information	Yes	§ 63.11176(a) specifies the dates for submitting the notification of changes report.
§ 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§ 63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in § 63.11177.
§ 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§ 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§ 63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§ 63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§ 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§ 63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in § 63.11176.
§ 63.10(d)(2)-(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§ 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§ 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§ 63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§ 63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§ 63.12	State Authority and Delegations	Yes	
§ 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§ 63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in § 63.11173(e)(2) and (3) are incorporated and included in § 63.14.
§ 63.15	Availability of Information/Confidentiality	Yes	

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§ 63.16(a)	Performance Track Provisions— reduced reporting	Yes	
§ 63.16(b)-(c)	Performance Track Provisions— reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Minor Source Operating Permit (MSOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Stealth Enterprises, LLC</b>
<b>Source Location:</b>	<b>907 S. Division St., Bristol, IN 46507</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3799</b>
<b>Operation Permit No.:</b>	<b>039-31078-00716</b>
<b>Operation Permit Issuance Date:</b>	<b>February 17, 2012</b>
<b>Significant Permit Revision No.:</b>	<b>039-33515-00716</b>
<b>Permit Reviewer:</b>	<b>Douglas Logan</b>

On August 12, 2013, the Office of Air Quality (OAQ) received an application from Stealth Enterprises, LLC related to a modification to an existing stationary cargo trailer manufacturing operation.

**Existing Approvals**

The source was issued MSOP No. 039-31078-00716 on February 17, 2012. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM<sub>2.5</sub>

Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> 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.

<b>Fugitive Emissions</b>
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- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

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

This PTE table is from the TSD Appendix A of MSOP No. 039-31078-00716 issued on February 17, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Plasma Cutting (PC)	0.01	0.01	0.01	-	-	-	-	-	-	-
7 Welding Stations (W1-W7)	0.26	0.26	0.26	-	-	-	-	-	-	-
Assembly Operation (A1)	-	-	-	-	-	10.09	-	-	0.29	0.28 (xylenes)
Surface Coating Booth (SC1)	18.81	18.81	18.81	-	-	30.28	-	-	-	-
Combustion	0.04	0.15	0.15	0.01	1.93	0.11	1.62	2,327	0.04	0.03 (n-hexane)
<b>Total PTE of Entire Source</b>	<b>19.1</b>	<b>19.2</b>	<b>19.2</b>	<b>0.01</b>	<b>1.93</b>	<b>40.5</b>	<b>1.62</b>	<b>2,327</b>	<b>0.29</b>	<b>0.28 (xylenes)</b>
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible  
 These emissions are based on TSD Appendix A, MSOP No. 039-31078-00716  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Stealth Enterprises, LLC on August 12, 2013, relating to relocation of the existing cargo trailer assembly line to a new building on the same site and construction of two (2) new cargo trailer assembly lines, resulting in an increase of manufacturing capacity from 2.5 trailers per hour to 5 trailers per hour.

The source has also asked to change descriptive information to the following:

Plant 1

- (a) One (1) cargo trailer assembly line, identified as A1, constructed in September 2009, approved in 2013 for modification, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.
- (b) Two (2) cargo trailer assembly lines, collectively identified as A2, approved in 2013 for construction, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.
- (c) Seven (7) natural gas-fired radiant tube heaters, identified as A3-A9, approved in 2013 for construction, with a combined maximum heat input rating of 1.3 MMBtu/hr, exhausting indoors.

Plant 2

- (d) Seven (7) MIG welding operations, identified as W1-W7, installed in 2009, exhausting indoors.
- (e) One (1) plasma cutting operations, identified as PC, installed in 2001, with a maximum capacity of cutting metal thickness of 0.25 inches and 56 inches per minute, exhausting indoors.

Plant 3,

Decal application in Plant 3 does not generate regulated air pollutants.

Plant 4

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.

Miscellaneous

- (g) Eleven (11) natural gas fired radiant tube heaters, identified as Plant 2, 3, & 4 combustion units (formerly H1-H8), installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.
- (h) Three (3) natural gas fired air make up units, identified as Plant 2, 3, & 4 combustion units (formerly H9-H11), installed in September 2009, with a combined maximum heat input rate of 1.4 MMBtu per hour, exhausting indoors.
- (i) Paved and unpaved roads and parking lots with public access.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Plant 1 Natural Gas Combustion	0.01	0.04	0.04	0.003	0.56	0.03	0.47	674	0.01	0.01 (n-hexane)
Plant 1 Assembly	0.42	0.42	0.42	-	-	8.00	-	-	2.79	2.62 (xylenes)
Plant 4 Painting	18.21	18.21	18.21	-	-	32.72	-	-	0.63	0.95 (naphthalene)
<b>Total PTE of Proposed Revision</b>	<b>18.64</b>	<b>18.67</b>	<b>18.67</b>	<b>0.003</b>	<b>0.56</b>	<b>40.75</b>	<b>0.47</b>	<b>674</b>	<b>3.43</b>	<b>2.62</b> <b>(xylenes)</b>
negl. = negligible										

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves an increase in the potential to emit for VOC greater than or equal to twenty-five (25) tons per year.

**PTE of the Entire Source After Issuance of the MSOP Revision**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, 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 Revision (tons/year)									
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs* **	Worst Single HAP
Plant 1 Natural Gas Combustion	0.01	0.04	0.04	0.003	0.56	0.03	0.47	674	0.01	0.01 (n-hexane)
Plant 1 Assembly	0.83	0.83	0.83	-	-	16.00	-	-	5.58	5.25 (xylenes)
Plant 2, 3, & 4 Natural Gas Combustion	0.04	0.14	0.14	0.011	1.89	0.10	1.59	2,281	0.04	0.03 (n-hexane)
Plant 2 Welding	0.26	0.26	0.26	-	-	-	-	-	negl	negl
Plant 2 Plasma Cutting	0.01	0.01	0.01	-	-	-	-	-	negl	negl
Plant 4 Painting	36.42	36.42	36.42	-	-	65.44	-	-	1.26	0.95 (naphthalene)
<b>Total PTE of Entire Source</b>	<b>37.62</b>	<b>37.76</b>	<b>37.76</b>	<b>0.015</b>	<b>2.45</b>	<b>81.58</b>	<b>2.06</b>	<b>2,955</b>	<b>6.89</b>	<b>5.25</b> (xylenes)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ***VOC and HAP PTE for the entire source was recalculated from updated information provided by the source										

**MSOP Status**

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

- (c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart (MM) (326 IAC 12), are not included for this proposed revision, since this source is not an automobile or light duty truck assembly operation.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM, are not included for this proposed revision, since this source is not a major source of HAP emissions.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP, are not included for this proposed revision, since this source is not a major source of HAP emissions.
- (e) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, because the source performs spray application of surface coatings to mobile equipment.

The three (3) cargo trailer assembly lines, located at Plant 1, are not subject to the requirements of NESHAP, since the application of adhesives and sealants is not considered a coating for the purposes of this NESHAP.

The facilities subject to this rule include the following:

- (1) One (1) cargo trailer painting process, located in Plant 4

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169  
(2) 40 CFR 63.11170  
(3) 40 CFR 63.11171  
(4) 40 CFR 63.11172(a)(2)  
(5) 40 CFR 63.11173(e), (f), and (g)  
(6) 40 CFR 63.11174  
(7) 40 CFR 63.11175  
(8) 40 CFR 63.11176  
(9) 40 CFR 63.11177  
(10) 40 CFR 63.11178  
(11) 40 CFR 63.11179  
(12) 40 CFR 63.11180  
(13) Table 1 to Subpart HHHHHH

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source as specified in 40 CFR 63, Subpart HHHHHH, in accordance with the schedule in 40 CFR 63, Subpart HHHHHH.

- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.25}}$$

Where:

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

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Plant 2, 3, & 4	2009	3.2	3.2	0.81	0.6	0.002
Plant 1	2013	1.3	5.4	0.70	0.6	0.002
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-1(b)(9) and (10), the welding and plasma cutting processes in Plant 2 are exempt from the limitations in 326 IAC 6-3-2 because the MIG welding processes have the potential to consume less than 625 pounds of rod or wire per day and the plasma cutting process has the capacity to cut less than 3,400 inches per hour of stock one (1) inch or less thickness.
  - (2) Pursuant to 326 IAC 6-3-2(d), surface coating manufacturing processes in Plant 4 shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to 326 IAC 6-3-2(d)(1) - (4).
  - (3) Individual pieces of woodworking equipment with potential emissions less than 0.551 lb/hr, including but not limited to table saws and chop saws, with point-of-use dust collector such as bags, are exempt from 326 IAC 6-3-2(e) pursuant to 326 IAC 6-3-1(b)(14) for manufacturing processes with potential emissions (particulate) less than 0.551 pound per hour.
  - (4) Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3 do not apply to surface coating manufacturing processes that use less than five (5) gallons of coating per day. The source will limit spray adhesive usage in Plant 1 to less than 5 gallons per day, therefore 326 IAC 6-3-2(d) will not apply to the three (3) assembly lines at Plant 1.
- (j) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
 The proposed modifications do not have the potential to emit more than 25 US tons of fugitive particulate matter per year, therefore the modification is not subject to 326 IAC 6-5.
- (k) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
 The source is not located in one of the counties listed in 326 IAC 6.5-1(a), therefore the modification is not subject to 326 IAC 6.5.
- (l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
 The unlimited VOC potential emissions from the modification to Plant 4 is greater than twenty-five (25) tons per year. However, the source coats metal parts in SIC Code major group 37 and is subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-1-6(3)(A) the modification is not subject to the requirements of 326 IAC 8-1-6.
- (m) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)  
 The source coats metal parts in SIC Code major group 37. Pursuant to 326 IAC 8-2-9(a)(1)(E), the source is subject to 326 IAC 8-2-9(c), (e), and (f). Coatings applied by the source are

intended for exposure to outdoor weather at all times and must comply with the VOC content requirement in 326 IAC 8-2-9(c)(3).

- (1) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
- (2) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Plant 1 and Plant 4 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.
- (3) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
  - (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (E) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- (n) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (o) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) Pursuant to 326 IAC 8-2-9, compliance with the VOC content limits shall be determined pursuant to the applicable test methods and requirements of 326 IAC 8-1-4 and 40 CFR 60, Appendix A. The Permittee may use formulation data such as the container label, product data sheets, and safety data sheets. IDEM, OAQ and the U.S. EPA may require VOC content determination and verification of any coating or surface preparation product using 40 CFR 60, Appendix A, Method 24. In the event of any inconsistency between 40 CFR 60, Appendix A, Method 24 and formulation data, 40 CFR 60, Appendix A, Method 24 shall govern.
- (b) No testing requirements are include at this time because recordkeeping provisions are considered sufficient to demonstrate compliance. IDEM OAQ reserves the right to require testing.

### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

1. Section A - Source Summary is revised to incorporate new and relocated equipment, and to change descriptive information:

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

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

- ~~(a) One (1) surface coating booth, identified as SC1, constructed in September 2009, with a maximum capacity of coating 2.5 metal parts per hour, equipped with two guns, utilizing HVLP and airless spray applications, using dry filters as control, and exhausting through stack SCSV1.~~
- ~~(b) One (1) cargo trailer assembly operation, identified as A1, constructed in September 2009, with maximum capacity of assembling 2.5 units per hour of plastic parts, exhausting inside the building.~~
- ~~(c) Eleven (11) natural gas fired heaters, identified as H1-H11, installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.~~
- ~~(d) Seven (7) MIG welding stations, identified as W1-W7, installed in September 2009, exhausting indoors.~~
- ~~(e) One (1) plasma cutting station, identified as PC, installed in 2001, with a capacity of cutting metal thickness of 2 inches and 2.2 inches per minute, exhausting indoors.~~

#### Plant 1

- (a) One (1) cargo trailer assembly line, identified as A1, constructed in September 2009, approved in 2013 for modification, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.**
- (b) Two (2) cargo trailer assembly lines, collectively identified as A2, approved in 2013 for construction, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.**
- (c) Seven (7) natural gas-fired radiant tube heaters, identified as A3-A9, approved in 2013 for construction, with a combined maximum heat input rating of 1.3 MMBtu/hr, exhausting indoors.**

#### Plant 2

- (d) Seven (7) MIG welding operations, identified as W1-W7, installed in 2009, exhausting indoors.**
- (e) One (1) plasma cutting operations, identified as PC, installed in 2001, with a maximum capacity of cutting metal thickness of 0.25 inches and 56 inches per minute, exhausting indoors.**

#### Plant 4

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in**

**September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.**

#### Miscellaneous

- (g) **Eleven (11) natural gas fired radiant tube heaters, identified as Plant 2, 3, & 4 combustion units (formerly H1-H8), installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.**
  - (h) **Three (3) natural gas fired air make up units, identified as Plant 2, 3, & 4 combustion units (formerly H9-H11), installed in September 2009, with a combined maximum heat input rate of 1.4 MMBtu per hour, exhausting indoors.**
  - (fi) Paved and unpaved roads and parking lots with public access
2. Section C Source Operation Conditions was modified to remove a condition noted as not applicable in the TSD for MSOP No. 039-31078-00716

#### ~~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.~~

Subsequent Section C conditions were renumbered

3. IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**
  - (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.
4. IDEM has revised Section D.1 - Emissions Unit Operation Conditions to incorporate applicable requirements for new and existing facilities

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (a) ~~One (1) surface coating booth, identified as SC1, constructed in September 2009, with a maximum capacity of coating 2.5 metal parts per hour, equipped with two guns, utilizing HVLP and airless spray applications, using dry filters as control, and exhausting through stack SCSV1.~~

- ~~(b) One (1) cargo trailer assembly operation, identified as A1, constructed in September 2009, with maximum capacity of assembling 2.5 units per hour of plastic parts, exhausting inside the building.~~
- ~~(c) Eleven (11) natural gas fired heaters, identified as H1-H11, installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.~~
- ~~(d) Seven (7) MIG welding stations, identified as W1-W7, installed in September 2009, exhausting indoors.~~
- ~~(e) One (1) plasma cutting station, identified as PC, installed in 2001, with a capacity of cutting metal thickness of 2 inches and 2.2 inches per minute, exhausting indoors.~~
- ~~(f) Paved and unpaved roads and parking lots with public access~~

**Plant 1**

- (a) One (1) cargo trailer assembly line, identified as A1, constructed in September 2009, approved in 2013 for modification, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.**
- (b) Two (2) cargo trailer assembly lines, collectively identified as A2, approved in 2013 for construction, with a maximum capacity of five (5) trailers per hour, applying adhesives and sealants to metal and wood, and exhausting indoors.**

**Plant 4**

- (f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.**

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

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

**D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]**

~~Pursuant to 326 IAC 8-2-9, when coating metal frame, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon of coating for air dried or forced warm air dried coatings or extreme performance coating, excluding water, as delivered to the applicator at the surface coating booth.~~

- (a) 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 applied to metal parts, excluding water, as delivered to the applicator**
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Plant 1 and Plant 4 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.**

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

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Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

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

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

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- (a) Pursuant to ~~326 IAC 6-3-2(d)~~, ~~p~~ Particulate from the surface coating booth **Plant 4** shall be controlled by ~~a~~ dry particulate filters, water wash, or an equivalent control device and the Permittee shall operate ~~each~~ **the** control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.4 Particulate [326 IAC 6-3]**

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In order to render the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) not applicable, the cargo trailer assembly lines, located in Plant 1, shall use less than 5 gallons of spray-applied adhesive per day.

Compliance with the above limit shall render the requirements 326 IAC 6-3-2(d) not applicable to the cargo trailer assembly lines (Plant 1).

**D.1.35 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan is required for these facilities and any control devices. Section B -

Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.46 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) **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.

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

#### D.1.57 Record Keeping Requirements

(a) To document **the compliance status** with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit **emission limits for coatings applied to metal parts** established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days ~~of~~ **after** the end of each compliance period.

- (1) The VOC 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.

(b) **To document the compliance status with Conditions D.1.4, the Permittee shall maintain records in accordance with (1) below. Records maintained shall be complete and sufficient to establish compliance with the coating usage limit established in Conditions D.3.1.**

- (1) **The amount of coating material used on daily basis.**

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

5. IDEM has added Section D.2 - Emissions Unit Operation Conditions to incorporate applicable requirements for new and existing facilities

### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

#### Plant 1

- (c) **Seven (7) natural gas-fired radiant tube heaters, identified as A3-A9, approved in 2013 for construction, with a combined maximum heat input rating of 1.3 MMBtu/hr, exhausting**

**indoors.**

**Miscellaneous**

**(g) Eleven (11) natural gas fired radiant tube heaters, identified as Plant 2, 3, & 4 combustion units (formerly H1-H8), installed in September 2009, with a combined maximum heat input rate of 4.6 MMBtu per hour, exhausting indoors.**

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

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

**D.2.1 Particulate Emissions Limitation [326 IAC 6-2-4]**

**Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from radiant tube heater shall be limited to 0.6 pounds per MMBtu heat input.**

7. IDEM has added Section E.1 - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH] to incorporate applicable requirements for new and modified facilities

**Section E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]**

**Operation Description:**

**Plant 4**

**(f) One (1) cargo trailer painting operation, identified as SC1, constructed in September 2009, approved 2013 for modification, with a maximum capacity of five (5) trailers per hour, coating metal, wood, and plastic parts, equipped with two (2) HVLP or airless spray guns, using dry filters for particulate control equipment, and exhausting through stack SCSV1. Under 40 CFR 63, Subpart HHHHHH, this facility is considered a new affected source.**

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

**E.1.1 General Provisions Relating to NESHAP HHHHHH [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

**(a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, as specified in 40 CFR 63, Subpart HHHHHH, in accordance with the schedule in 40 CFR 63, Subpart HHHHHH.**

**(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:**

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

and

**United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

**E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit), as specified as follows:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170
- (3) 40 CFR 63.11171
- (4) 40 CFR 63.11172(a)(2)
- (5) 40 CFR 63.11173(e), (f), and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1 to Subpart HHHHHH

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 12, 2013

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 039-33515-00716. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Douglas Logan, P.E. 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) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Summary**

Company Name: Stealth Enterprises, LLC  
Address City IN Zip: 907 S. Division St., Bristol, Indiana 46507  
MSOP SPR No.: 039-33515-00716  
Reviewer: Douglas Logan, P.E.  
Date: 9/30/2013

Uncontrolled Potential to Emit (US tons/year)											
Process/emission unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	GHGs	Single HAP ID	Single HAP	HAPs combined
Plant 1 combustion	0.01	0.04	0.04	0.003	0.56	0.03	0.47	674	n-hexane	0.01	0.01
Plant 1 Assembly	0.83	0.83	0.83	-	-	16.00	-	-	xylenes	5.25	5.58
Plant 2, 3, & 4 combustion	0.04	0.14	0.14	0.011	1.89	0.10	1.59	2,281	n-hexane	0.03	0.04
Plant 2 Welding	0.26	0.26	0.26	-	-	-	-	-	Mn compounds	2.15E-03	2.26E-03
Plant 2 Cutting	0.06	0.06	0.06	-	-	-	-	-	Mn compounds	6.55E-08	6.55E-08
Plant 4 Painting	36.42	36.42	36.42	-	-	65.4	-	-	naphthalene	0.95	1.26
<b>Total PTE</b>	<b>37.62</b>	<b>37.76</b>	<b>37.76</b>	<b>0.015</b>	<b>2.45</b>	<b>81.58</b>	<b>2.06</b>	<b>2,955</b>	<b>xylenes</b>	<b>5.25</b>	<b>6.89</b>

Potential to Emit After Issuance of this Revision (US tons/year)											
Process/emission unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	GHGs	Single HAP ID	Single HAP	HAPs combined
Plant 1 combustion	0.01	0.04	0.04	0.00	0.56	0.03	0.47	674	n-hexane	0.01	0.01
Plant 1 Assembly	0.83	0.83	0.83	-	-	16.00	-	-	xylenes	5.25	5.58
Plant 2, 3, & 4 combustion	0.04	0.14	0.14	0.01	1.89	0.10	1.59	2,281	n-hexane	0.03	0.04
Plant 2 Welding	0.26	0.26	0.26	-	-	-	-	-	Mn compounds	0.00	0.00
Plant 2 Cutting	0.06	0.06	0.06	-	-	-	-	-	Mn compounds	6.55E-08	6.55E-08
Plant 4 Painting	36.42	36.42	36.42	-	-	65.44	-	-	naphthalene	0.95	1.26
<b>Total PTE</b>	<b>37.62</b>	<b>37.76</b>	<b>37.76</b>	<b>0.015</b>	<b>2.45</b>	<b>81.6</b>	<b>2.06</b>	<b>2,955</b>	<b>xylenes</b>	<b>5.25</b>	<b>6.89</b>

Potential to Emit of this Modification (US tons/year)											
Process/emission unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	GHGs	Single HAP ID	Single HAP	HAPs combined
Plant 1 combustion	0.01	0.04	0.04	0.003	0.56	0.03	0.47	674	n-hexane	0.01	0.01
Plant 1 Assembly	0.42	0.42	0.42	-	-	8.00	-	-	xylenes	2.62	2.79
Plant 4 Painting	18.21	18.21	18.21	-	-	32.72	-	-	naphthalene	0.47	0.63
<b>Total PTE</b>	<b>18.64</b>	<b>18.67</b>	<b>18.67</b>	<b>0.003</b>	<b>0.56</b>	<b>40.75</b>	<b>0.47</b>	<b>674</b>	<b>xylenes</b>	<b>2.62</b>	<b>3.43</b>

Note: The present modification includes moving existing assembly line to a new, dedicated building, and installation of two new assembly lines, doubling production capacity

**Appendix A: Emissions Calculations  
VOC and Particulate  
Plant 1 (Assembly)**

Company Name: **Stealth Enterprises, LLC**  
Address City IN Zip: **907 S. Division St., Bristol, Indiana 46507**  
MSOP SPR No.: **039-33515-00716**  
Reviewer: **Douglas Logan, P.E.**  
Date: **9/30/2013**

Material	Substrate	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Sikaflex-252	metal	10.2	ND	ND	ND	ND	ND	0.47	5	0.51	0.51	1.20	28.71	5.24	0.00	ND	100%
SikaFast-3121	metal	8.0	ND	ND	ND	ND	ND	0.09	5	0.15	0.15	0.08	1.64	0.33	0.00	ND	100%
SikaFast-3081N	metal	10.8	ND	ND	ND	ND	ND	0.01	5								
ITW TACC-2001M	wood	5.9	75.70%	0.0%	75.7%	0.0%	32.00%	0.11	5	4.44	4.44	2.37	56.90	10.38	0.83	13.89	75%
Trempro 644	metal	8.5	ND	ND	ND	ND	ND	0.28	5	0.008	0.008	0.01	0.27	0.05	0.00	ND	100%
Vulkem sealer	wood	13.7	ND	ND	ND	ND	ND	0.50	5	0.00	0.00	0.00	0.00	0.00	0.00	ND	100%

**Total Potential to Emit**

<b>3.65</b>	<b>87.51</b>	<b>16.00</b>	<b>0.83</b>
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**METHODOLOGY**

Mixing ratio for two-component adhesive is 10 parts 3121 ; 1 part 3081N  
Pounds of VOC per Gallon of Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per of Gallon Coating less Water = Pounds of VOC per Gallon Coating for Sika, Trempro, and Vulkem products  
Pounds of VOC per of Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Pounds of VOC per Gallon of Coating for Sika, Trempro, and Vulkem products taken from MSDS's provided by source  
Pounds of VOC per Gallon of Coating for SikaFast 3121/3081N system determined in accordance with Appendix A, 40 CFR 63 Subpart PPPP, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon of Coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon of Coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon of Coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used  
Transfer efficiency for 2001M adhesive is accepted value for HVLP spray on large flat panels  
ND - no data

Material	Substrate	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Xylene Weight %	Methyl Methacrylate* Weight %	Xylene Emissions (US ton/yr)	Methyl Methacrylate Emissions (US ton/yr)
Sikaflex-252	metal	10.20	0.47	5	5.00%	0.00%	5.25	0.00
SikaFast-3121	metal	8.00	0.09	5	0.00%	2.08%	0.00	0.33
					0.00%	0.00%	0.00	0.00

**Total Potential to Emit (single HAPs) (US tons/yr)**

<b>5.25</b>	<b>0.33</b>
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**Total Potential to Emit (all HAPs) (US tons/yr)**

<b>5.58</b>
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**METHODOLOGY**

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

Notes:

\* Worst case HAP emissions from SikaFast 3121/3081N system assumed equal to VOC content determined using Appendix A, 40 CFR 63, Subpart PPPP, Wt % HAP (as MMA) = (App A VOC, lb/gal) / (Density, lb/gal) x 100

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**Plant 1 (Assembly)**

**Company Name: Stealth Enterprises, LLC**

**Address City IN Zip: 907 S. Division St., Bristol, Indiana 46507**

**MSOP SPR No.: 039-33515-00716**

**Reviewer: Douglas Logan, P.E.**

**Date: 9/30/2013**

Including 7 radiant tube heaters 1.3 MMBtu/hr combined

Heat Input Capacity MMBtu/hr	HHV MMBtu MMCF	Potential Throughput MMCF/yr
1.3	1020	11.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM <sub>10</sub> *	direct PM <sub>2.5</sub> *	SO <sub>2</sub>	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in US tons/yr	0.01	0.04	0.04	0.00	0.56	0.03	0.47

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined.

PM<sub>2.5</sub> emission factor is filterable and condensable PM<sub>2.5</sub> combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	n-Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in US tons/yr	1.172E-05	6.699E-06	4.187E-04	1.005E-02	1.898E-05

Emission Factor in lb/MMcf	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 US tons/yr	2.791E-06	6.141E-06	7.815E-06	2.121E-06	1.172E-05

Worst-case single HAP (n-hexane), US tons/yr	1.00E-02
Total HAP, US tons/yr	1.05E-02

Methodology is the same as above

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

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

See Page 3 for Greenhouse Gas calculations.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
	120,000	2.3	2.2
Potential Emission in US tons/yr	670	0.0	0.0
Summed Potential Emissions in US tons/yr	670		
CO <sub>2</sub> e Total in US tons/yr	674		

**Methodology**

The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O 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.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO<sub>2</sub>e (US tons/yr) = CO<sub>2</sub> Potential Emission US ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission US ton/yr x CH<sub>4</sub> GWP (21) + N<sub>2</sub>O Potential Emission US ton/yr x N<sub>2</sub>O GWP (310).

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Plant 2, 3, & 4**

**Company Name: Stealth Enterprises, LLC  
Address City IN Zip: 907 S. Division St., Bristol, Indiana 46507  
MSOP SPR No.: 039-33515-00716  
Reviewer: Douglas Logan, P.E.  
Date: 9/30/2013**

Including 8 radiant tube heaters 3 MMBtu/hr combined  
3 Heil AMU 1.4 MMBtu/hr combined

Heat Input Capacity MMBtu/hr	HHV MMBtu	Potential Throughput MMCF/yr
4.4	1020	37.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM <sub>10</sub> *	direct PM <sub>2.5</sub> *	SO <sub>2</sub>	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in US tons/yr	0.04	0.14	0.14	0.01	1.89	0.10	1.59

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined.

PM<sub>2.5</sub> emission factor is filterable and condensable PM<sub>2.5</sub> combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	n-Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in US tons/yr	3.968E-05	2.267E-05	1.417E-03	3.401E-02	6.424E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in US tons/yr	9.447E-06	2.078E-05	2.645E-05	7.180E-06	3.968E-05

Worst-case single HAP (n-hexane), US tons/yr	3.40E-02
Total HAP, US tons/yr	3.57E-02

Methodology is the same as above

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

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

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO <sub>2</sub> 120,000	CH <sub>4</sub> 2.3	N <sub>2</sub> O 2.2
Potential Emission in US tons/yr	2,267	0.0	0.0
Summed Potential Emissions in US tons/yr	2,267		
CO <sub>2</sub> e Total in US tons/yr	2,281		

**Methodology**

The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O 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.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO<sub>2</sub>e (US tons/yr) = CO<sub>2</sub> Potential Emission US ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission US ton/yr x CH<sub>4</sub> GWP (21) + N<sub>2</sub>O Potential Emission US ton/yr x N<sub>2</sub>O GWP (310).

**Appendix A: Emissions Calculations  
Plant 2 Welding/Cutting Emissions**

Company Name: Stealth Enterprises, LLC  
 Address City IN Zip: 907 S. Division St., Bristol, Indiana 46507  
 MSOP SPR No.: 039-33515-00716  
 Reviewer: Douglas Logan, P.E.  
 Date: 9/30/2013

Welding	Max Electrode Consumption (lbs/hr)	Emission Factor (lb/10 cubed lb wire consumed)			Emissions (tons/yr)		
		PM10	Cr	Mn	PM10	Cr	Mn
Mig Weld Station 1	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 2	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 3	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 4	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 5	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 6	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
Mig Weld Station 7	3,504	0.0024	0.000001	0.00002	0.036834	0.00002	0.00031
<b>TOTAL</b>					<b>0.257838</b>	<b>0.00011</b>	<b>0.00215</b>
					<b>0.00226</b>		

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 (ton/yr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1.00	0.250	56	0.0039	2.00E-05	0.000001	0.000001	0.057	6.55E-08	1.15E-12	2.05E-20	6.55E-08

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.  
 Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick  
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)  
 Largest workpiece for plasma cutting is 8" x 2" tubing, 0.25" wall thickness, less than 170 pieces cut per hour  
 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, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations  
Plant 4 (Painting)**

**Company Name:** Stealth Enterprises, LLC  
**Address City IN Zip:** 907 S. Division St., Bristol, Indiana 46507  
**MSOP SPR No.:** 039-33515-00716  
**Reviewer:** Douglas Logan, P.E.  
**Date:** 9/30/2013

Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water & exempt	Pounds VOC per gallon of coating as applied	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	PTE PM/PM10 (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Substrate
Booth	Z Technologies	Z Guard1021 FR	Undercoating	10.01	26.00%	4.00%	22.00%	6.06%	63.00%	0.5000	5.0	2.34	2.62	6.55	157.20	28.69	20.28	3.50	75%	Metal
Booth	Z Technologies	Z Shield 7800 X	Paint	9.59	38.50%	3.50%	35.00%	4.73%	45.70%	0.5000	5.0	3.52	3.36	8.39	201.39	36.75	16.15	7.34	75%	Metal

**Total Potential to Emit**

<b>Total</b>	<b>14.94</b>	<b>358.59</b>	<b>65.44</b>	<b>36.42</b>
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**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)  
PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
PTE PM/PM10 (tons/yr) = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used  
Transfer efficiency for coatings is accepted value for HVLP spray on large flat panels

**HAZARDOUS AIR POLLUTANTS**

Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	xylenes Weight %	toluene Weight %	ethylbenzene Weight %	naphthalene Weight %	xylenes (US tons/yr)	toluene (US tons/yr)	ethylbenzene (US tons/yr)	naphthalene (US tons/yr)
Booth	Z Technologies	Z Guard1021 FR	Undercoating	10.01	0.5	5.000	0.23%	0.03%	0.03%	0.00%	0.25	0.03	0.03	0.00
Booth	Z Technologies	Z Shield 7800 X	Paint	9.59	0.5	5.000	0.00%	0.00%	0.00%	0.90%	0.00	0.00	0.00	0.95

**Total Potential to Emit (single HAPs) (US tons/yr)**

<b>0.25</b>	<b>0.03</b>	<b>0.03</b>	<b>0.95</b>
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**Total Potential to Emit (all HAPs) (US tons/yr)**

<b>1.26</b>
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**METHODOLOGY**

HAP content of coating solvents estimated from Tables 3 and 4, 40 CFR 63, Subpart M  
HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* (1 ton/2000 lbs)



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Stuart Keaton  
Stealth Enterprises, LLC  
907 South Division Street  
Bristol, Indiana 46907

DATE: December 2, 2013

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

SUBJECT: Final Decision  
First Significant Revision to MSOP  
039-33515-00716

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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

December 2, 2013

TO: Bristol Public Library

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

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

**Applicant Name: Stealth Enterprises, LLC**  
**Permit Number: 039-33515-00716**

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

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

Enclosures  
Final Library.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	PWAY 12/3/2013 Stealth Enterprises, LLC 039-33515-00716 (final)		<b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
3		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
4		Nate Black D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
5		Bristol Washington Township Public Library 505 West Vistula Street Bristol IN 46507-0789 (Library)										
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