



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: January 30, 2014

RE: MOR/ryde International, Inc./039-33976-00634

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 6/13/2013



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Ben Paulus
MOR/ryde International, Inc.
23208 Cooper Drive
Elkhart, Indiana 46514

January 30, 2014

Re: 039-33976-00634
Minor Revision to
M039-30970-00634

Dear Ben Paulus:

MOR/ryde International, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M039-30970-00634 on March 9, 2012 for a stationary recreational vehicle (RV) metal chassis modification facility located at 23208 Cooper Drive, Elkhart, Indiana. On December 11, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to construct a new cross draft spray booth, two (2) stretch paint lines, associated natural gas combustion units, and fifty (50) additional welding stations in a new facility named Plant 4. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and 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 Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

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

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

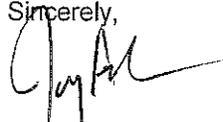
This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

MOR/ryde International, Inc.
Elkhart, Indiana
Permit Reviewer: Joshua Levering

Page 2 of 2
MSOP MPR No. 039-33976-00634

If you have any questions on this matter, please contact Joshua Levering of my staff at 317-234-6543 or 1-800-451-6027, and ask for extension 4-6543.

Sincerely,



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA/jjl

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



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Commissioner

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**MOR/ryde International, Inc.
23208 Cooper Drive
Elkhart, Indiana 46514**

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

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

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

Operation Permit No.: M039-30970-00634	
Issued by: <i>Original Signed by:</i>	Issuance Date: March 9, 2012
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: March 9, 2022

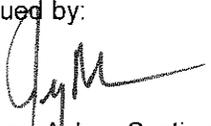
Minor Permit Revision No.: 039-33976-00634	
Issued by: 	Issuance Date: January 30, 2014
Jenny Acker, Section Chief Permits Branch Office of Air Quality	Expiration Date: March 9, 2022

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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)]

The Permittee owns and operates a stationary recreational vehicle metal chassis modification facility.

Source Address:	23208 Cooper Drive, Elkhart, Indiana 46514
General Source Phone Number:	(574) 293-1581
SIC Code:	3799 (Transportation Equipment, Not Classified Elsewhere)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories Greenhouse Gases (GHGs) are less than one hundred thousand (100,000) tons of CO ₂ equivalent emissions (CO ₂ e) per year.

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) spray booth for painting metal parts, identified as SB1, constructed in 2007, with a maximum production rate of 0.66 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-1.
- (b) One (1) spray booth for painting metal parts, identified as SB2, constructed in 2007, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-2.
- (c) One (1) spray booth for painting metal parts, identified as SB3, approved in 2014 for construction, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-3.
- (d) Two (2) Stretch Lines for touch-up painting of vehicle chassis, identified as SL1 and SL2, approved in 2014 for construction, each with a maximum production rate of 0.66 units per hour, and exhausting to stacks FV-10 through FV-15.
- (e) Three (3) spray gun cleanup operations, identified as SGC1, SGC2, and SGC3, with a combined maximum annual solvent usage of 2,628 gallons per year, with SGC1 exhausting to stacks FV-10 through FV-15; SGC2 exhausting to stacks FV-5 through FV-9; and SGC3 exhausting to stacks FV-10 through FV-15. SGC1 and SGC2 constructed in 2007 and SGC3 approved in 2014 for construction.

- (f) Welding operations, consisting of one hundred (100) welding stations, identified as W1 through W100, each using 0.3 pounds of welding consumables per hour per welder, with particulate emissions uncontrolled, with welders W1 - W37 exhausting to stacks FV-1 through FV-4; welders W38 - W75 exhausting to stacks FV5 through FV-9; and welders W76 - W100 exhausting to stacks FV-10 through FV-15. W1 through W50 constructed in 2007 and W51 through W100 approved in 2014 for construction.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) Four (4) space heaters, identified as SH1 through SH4, constructed in 2007, each with a maximum heat input capacity of 0.56 MMBtu per hour, and exhausting to stacks SHV-1 through SHV-4, respectively.
 - (2) Two (2) air make-up units, identified as AMU1 and AMU2, constructed in 2007, each with a maximum heat input capacity of 7.0 MMBtu per hour, and exhausting to stacks FV-1 through FV-5.
 - (3) Two (2) air make-up units, identified as AMU3 and AMU4, constructed in 2007, each with a maximum heat input capacity of 5.0 MMBtu per hour, and exhausting to stacks FV-6 through FV-9.
 - (4) Two (2) air make-up units, identified as AMU5 and AMU6, approved in 2014 for construction, each with a maximum heat input capacity of 0.56 MMBtu per hour, and exhausting to stacks FV-10 through FV-15.
 - (5) Two (2) furnaces, identified as GF1 and GF2, constructed in 2007, each with a maximum heat input capacity of 0.06 MMBtu per hour, and exhausting to stack GFV-1 and GFV-2.
 - (6) One (1) furnace, identified as GF3, constructed in 2007, with a maximum heat input capacity of 0.10 MMBtu per hour, and exhausting to stack GFV-3.
 - (7) One (1) furnace, identified as GF4, approved in 2014 for construction, with a maximum heat input capacity of 0.04 MMBtu per hour, and exhausting to stack GFV-4.
 - (8) Two (2) spray booth heaters, identified as SBH1 and SBH2, constructed in 2007, each with a maximum heat input capacity of 1.5 MMBtu per hour, and exhausting to stacks SBV-1 and SBV-2, respectively.
- (h) Closed loop heating and cooling systems.
- (i) Paved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M039-30970-00634, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M039-30970-00634 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

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

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

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

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]

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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]

- (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]

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]

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. The analog instrument shall be capable of measuring values outside of 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.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (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]

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]

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth for painting metal parts, identified as SB1, constructed in 2007, with a maximum production rate of 0.66 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-1.
- (b) One (1) spray booth for painting metal parts, identified as SB2, constructed in 2007, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-2.
- (c) One (1) spray booth for painting metal parts, identified as SB3, approved in 2014 for construction, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-3.
- (e) Three (3) spray gun cleanup operations, identified as SGC1, SGC2, and SGC3, with a combined maximum annual solvent usage of 2,628 gallons per year, with SGC1 exhausting to stacks FV-10 through FV-15; SGC2 exhausting to stacks FV-5 through FV-9; and SGC3 exhausting to stacks FV-10 through FV-15. SGC1 and SGC2 constructed in 2007 and SGC3 approved in 2014 for construction.

(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 Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of each coating delivered to the applicator at the spray booths (SB1, SB2, and SB3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) 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:
 - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) 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.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) 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.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (SB1, SB2, and SB3) 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.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.5 Particulate Control

In order to comply with Condition D.1.3, the dry particulate filter for particulate control shall be in operation and control emissions from Spray Booth SB1, Spray Booth SB2, and Spray Booth SB3 at all times that the spray booths are in operation.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1)(A) and (B) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.

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

**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).

Company Name:	MOR/ryde International, Inc.
Address:	23208 Cooper Drive
City:	Elkhart, Indiana 46514
Phone #:	(574) 293-1581
MSOP #:	M039-30970-00634

I hereby certify that MOR/ryde International, Inc. is :

still in operation.

no longer in operation.

I hereby certify that MOR/ryde International, Inc. is :

in compliance with the requirements of MSOP M039-30970-00634.

not in compliance with the requirements of MSOP M039-30970-00634.

Authorized Individual (typed):
Title:
Signature:
Date:

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.

Noncompliance:

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:

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

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

Source Description and Location
--

Source Name:	MOR/ryde International, Inc.
Source Location:	23208 Cooper Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3799 (Transportation Equipment, Not Elsewhere Classified)
Operation Permit No.:	M039-30970-00634
Operation Permit Issuance Date:	March 9, 2012
Minor Permit Revision No.:	039-33976-00634
Permit Reviewer:	Joshua Levering

On December 11, 2013, the Office of Air Quality (OAQ) received an application from MOR/ryde International, Inc. related to a modification to an existing stationary recreational vehicle (RV) metal chassis modification facility.

Existing Approvals

The source was issued MSOP Renewal No. 039-30970-00634 on March 9, 2012. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ 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.	

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

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

Fugitive Emissions

- (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.

Status of the Existing Source

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 for M039-30970-00634, issued on March 9, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)*									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Booth (SB1)	4.16	4.16	4.16	0	0	17.2	0	0	0	0
Spray Booth (SB2)	2.28	2.28	2.28	0	0	9.45	0	0	0	0
Cleanup Solvent (SGC1, SGC2)	0	0	0	0	0	5.67	0	0	0	0
Welding (W1-W50)	0.34	0.34	0.34	0	0	0	0	0	0.02	0.02 Manganese
Natural Gas Combustion	0.25	0.98	0.98	0.08	12.9	0.71	10.9	15,600	0.24	0.24 Hexane
Paved Roads	0.89	0.18	0.04	0	0	0	0	0	0	0
Total PTE of Entire Source	7.92	7.94	7.81	0.08	12.9	33.1	10.9	15,599.6	0.26	0.24 Hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)*									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible *These emissions are based upon the potential to emit of the entire source from the MSOP Renewal No. 039-30970-00634, issued on March 9, 2012. **The 100,000 CO ₂ 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 MOR/ryde International, Inc. on December 11, 2013, relating to the addition of a new facility named Plant 4. The new facility operations include the removal of paint booth SB1 from the existing Plant 2 and relocating it to Plant 4 along with all required support equipment and air makeup unit. A new cross draft spray booth, identified as SB3, with filtered doors that requires no air makeup unit or spray booth heating, will be installed in Plant 4. Three new heating emission sources will be installed in Plant 4, including one (1) furnace for the office, identified as GF4, with a maximum heat input capacity of 0.04 MMBtu/hr, and two (2) air makeup units, identified as AMU5 and AMU6, with a maximum heat input capacity of 0.56 MMBtu/hr.

Additionally, the existing spray booths, identified as SB1 and SB2, will be using a coating that has lower pounds of VOC per gallon than previously permitted.

The following is a list of the new emission units and pollution control device(s):

- (a) One (1) spray booth for painting metal parts, identified as SB3, approved in 2014 for construction, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, and exhausting at stack SBV-3.
- (b) Two (2) Stretch Lines for touch-up painting of vehicle chassis, identified as SL1 and SL2, approved in 2014 for construction, each with a maximum production rate of 0.66 units per hour, and exhausting to stacks FV-10 through FV-15.
- (c) One (1) spray gun cleanup operation, identified as SGC3, approved in 2014 for construction, with a maximum annual solvent usage of 876 gallons per year, using dry filters as control, with SGC3 exhausting to stacks FV-10 through FV-15.
- (d) Welding operations, consisting of fifty (50) welding stations, identified as W51 through W100, approved in 2014 for construction, each using 0.3 pounds of welding consumables per hour per welder, with particulate emissions uncontrolled, with welders W51 - W75 exhausting to stacks FV-5 through FV-9 and welders W76 - W100 exhausting to stacks FV-10 through FV-15.
- (e) Two (2) air make-up units, identified as AMU5 and AMU6, approved in 2014 for construction, each with a maximum heat input capacity of 0.56 MMBtu per hour, and exhausting to stacks FV-10 through FV-15.
- (f) One (1) furnace, identified as GF4, approved in 2014 for construction, with a maximum heat input capacity of 0.04 MMBtu per hour, and exhausting to stack GFV-4.

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	Uncontrolled PTE of Proposed Revision (tons/year)										
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e*	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Booth SB3	9.93	9.93	9.93	0	0	8.84	0	0	0	0	0
Stretch Line 1 (SL1)	0.52	0.52	0.52	0	0	0.47	0	0	0	0	0
Stretch Line 2 (SL2)	0.52	0.52	0.52	0	0	0.47	0	0	0	0	0
Welding (W51 - W100)	0.34	0.34	0.34	0	0	0	0	0	0	0.021	0.021 Manga- nese
Natural Gas Combustion (AMU5, AMU6, GF4)	0.01	0.04	0.04	0.003	0.50	0.03	0.42	601	601	0.01	0.01 Hexane
Total PTE of Proposed Revision	11.32	11.35	11.35	0.003	0.50	9.81	0.42	601	601	0.031	0.021 Manga- nese
negl. = negligible *CO ₂ e Total in tons/yr based on 11/29/2013 federal Global Warming Potentials (GWP) **CO ₂ e Total in tons/yr based on 10/30/2009 federal Global Warming Potentials (GWP)											

Pursuant to 326 IAC 2-6.1-6(g)(3), this MSOP is revised through Minor Permit Revision because the proposed revision involves the construction of new emission units with potential to emit within the following ranges:

- (A) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either PM, PM10, or direct PM2.5.
- (B) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of the following regulated air pollutants:
 - (i) Hydrogen sulfide (H₂S).
 - (ii) Total reduced sulfur (TRS).
 - (iii) Reduced sulfur compounds.
 - (iv) Fluorides.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)										
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e** (11/29/13-GWP)	GHGs as CO ₂ e** (10/30/09-GWP)	Total HAPs	Worst Single HAP
Welding (W1-W100)	0.68	0.68	0.68	0	0	0	0	0	0	0.04	0.04 Manganese
Natural Gas Combustion	0.25	1.00	1.00	0.08	13.15	0.72	11.04	15,872.1	15,874.3	0.25	0.24 Hexane
Paved Roads	0.89	0.18	0.04	0	0	0	0	0	0	0	0
Total PTE of Entire Source	9.63	9.67	9.53	0.08	13.15	35.46	11.04	15,872.1	15,874.3	0.29	0.24 Hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	100,000	NA	NA
negl. = negligible **The 100,000 CO ₂ 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.											

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 CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

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 does not perform surface coating on automobiles or light duty trucks as defined in 40 CFR 60.391.
- (b) There are no 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)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included for this proposed revision, since the solvent used in the spray gun cleaning operations does not contain any regulated halogenated solvents.
- (b) 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 (326 IAC 20-80), are not included for this proposed revision, since the source is an area source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included for this proposed revision, since the source does not perform any of the following: paint stripping operations of any kind; auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; and use coatings which contain any of the target HAPs. Chassis are not considered mobile equipment because the definition of *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.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included for this proposed revision, since the source is not primarily engaged in the operations listed as one of the nine source categories for this subpart.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This 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.
- (c) 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.

- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

State Rule Applicability – Individual Facilities

Spray Booth (SB3) and Stretch Lines (SL1 and SL2)

- (a) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the Spray Booth, identified as SB3, shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (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.

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.

Pursuant to 326 IAC 6-3-1(b)(15), the two (2) Stretch Lines, identified as SL1 and SL2, are exempt from the requirements of 326 IAC 6-3, because these surface coating processes use less than five (5) gallons of coatings per day.

- (b) 326 IAC 8-1-1 (Volatile Organic Compounds)
Pursuant to 326 IAC 8-1-1(b), the two (2) Stretch Lines, identified as SL1 and SL2, are exempt from the requirements of 326 IAC 8 because they have potential volatile organic compound emissions less than fifteen (15) pounds per day.

- (c) 326 IAC 8-1-6 (New facilities; general reduction requirements)
The Spray Booth, identified as SB3, is subject to another Article 8 rule. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (d) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The emission unit SB3 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day per emission unit, and it coats metal vehicle chassis.

Pursuant to 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:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) 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.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) 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.

Spray Gun Cleanup Operation (SGC3)

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements)
The spray gun cleanup operation (SGC3) has a potential to emit less than twenty-five (25) tons per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
The requirements of 326 IAC 8-3-2 and 326 IAC 8-3-8 are not applicable to the spray gun cleanup operations (SGC3) because these operations are not organic solvent degreasing operations performed in a cold cleaner degreasing facility. The spray operators clean the spray guns in the spray booth at the end of each shift using mineral spirits and manual methods. Solvent is pumped through the spray lines and guns, and sprayed into a bucket. The exterior of the gun is cleaned with solvent, scraper, and brush. Waste solvent is stored in a sealed drum.

Welding Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations (W51 through W100) are exempt from the requirements of 326 IAC 6-3 because less than six hundred twenty-five (625) pounds of rod or wire are consumed per day.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 039-30970-00634, issued on March 9, 2012.

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:

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) spray booth for painting metal parts, identified as SB1, constructed in 2007, with a maximum production rate of 0.66 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-1.
- (b) One (1) spray booth for painting metal parts, identified as SB2, constructed in 2007, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-2.
- (c) **One (1) spray booth for painting metal parts, identified as SB3, approved in 2014 for construction, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-3.**
- (d) **Two (2) Stretch Lines for touch-up painting of vehicle chassis, identified as SL1 and SL2, approved in 2014 for construction, each with a maximum production rate of 0.66 units per hour, and exhausting to stacks FV-10 through FV-15.**
- (ee) ~~Two~~**Three (3)** spray gun cleanup operations, identified as SGC1 ~~and~~ SGC2, **and SGC3**, ~~constructed in 2007, with a combined maximum annual solvent usage of 1,752,628 gallons per year, using dry filters as control, with SGC1 exhausting to stacks FV-10 through FV-15; and SGC2 exhausting to stacks FV-5 through FV-9; and SGC3 exhausting to stacks FV-10 through FV-15. SGC1 and SGC2 constructed in 2007 and SGC3 approved in 2014 for construction.~~
- (ef) Welding operations, consisting of ~~fifty one hundred (50100)~~ **one hundred (100)** welding stations, identified as W1 through W~~50100~~, ~~constructed in 2007~~, each using 0.3 pounds of welding consumables per hour per welder, with particulate emissions uncontrolled, with welders W1 - W~~3037~~ exhausting to stacks FV-1 through FV-~~54~~; ~~and~~ welders W~~3138~~ - W~~5075~~ exhausting to stacks FV~~65~~ **-through FV-9; and welders W76 - W100 exhausting to stacks FV-10 through FV-15. W1 through W50 constructed in 2007 and W51 through W100 approved in 2014 for construction.**
- (eg) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, ~~constructed in 2007~~, consisting of:
 - (1) Four (4) space heaters, identified as SH1 through SH4, **constructed in 2007**, each with a maximum heat input capacity of 0.56 MMBtu per hour, and exhausting to stacks SHV-1 through SHV-4, respectively.
 - (2) Two (2) air make-up units, identified as AMU1 and AMU2, **constructed in 2007**, each with a maximum heat input capacity of 7.0 MMBtu per hour, and exhausting

to stacks FV-1 through FV-5.

- (3) Two (2) air make-up units, identified as AMU3 and AMU4, **constructed in 2007**, each with a maximum heat input capacity of 5.0 MMBtu per hour, and exhausting to stacks FV-6 through FV-9.
- (4) **Two (2) air make-up units, identified as AMU5 and AMU6, approved in 2014 for construction, each with a maximum heat input capacity of 0.56 MMBtu per hour, and exhausting to stacks FV-10 through FV-15.**
- (45) ~~One~~**Two (2)** furnaces, identified as GF1 and GF2, **constructed in 2007**, each with a maximum heat input capacity of 0.06 MMBtu per hour, and exhausting to stack GFV-1 and GFV-2.
- (56) ~~Two~~**One (2)** furnaces, identified as ~~GF2~~ and GF3, **constructed in 2007**, each with a maximum heat input capacity of 0.10 MMBtu per hour, and exhausting to stacks ~~GFV-2~~ and GFV-3, respectively.
- (7) **One (1) furnace, identified as GF4, approved in 2014 for construction, with a maximum heat input capacity of 0.04 MMBtu per hour, and exhausting to stack GFV-4.**
- (68) Two (2) spray booth heaters, identified as SBH1 and SBH2, **constructed in 2007**, each with a maximum heat input capacity of 1.5 MMBtu per hour, and exhausting to stacks SBV-1 and SBV-2, respectively.

(fh) Closed loop heating and cooling systems.

(gi) Paved roads and parking lots with public access

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth for painting metal parts, identified as SB1, constructed in 2007, with a maximum production rate of 0.66 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-1.
- (b) One (1) spray booth for painting metal parts, identified as SB2, constructed in 2007, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-2.
- (c) **One (1) spray booth for painting metal parts, identified as SB3, approved in 2014 for construction, with a maximum production rate of 0.74 RV chassis per hour, using low pressure air-atomization spray methods, using dry filters as control, and exhausting at stack SBV-3.**
- (ee) ~~Two~~**Three (3)** spray gun cleanup operations, identified as SGC1 and, SGC2, and **SGC3**, ~~constructed in 2007~~, with a **combined** maximum annual solvent usage of ~~4,752~~ **2,628** gallons per year, ~~using dry filters as control~~, with SGC1 exhausting to stacks FV-10 through FV-15; and SGC2 exhausting to stacks **FV6-5 -through FV-9**; and **SGC3** exhausting to stacks **FV-10 through FV-15**. **SGC1 and SGC2 constructed in 2007 and SGC3 approved in 2014 for construction.**

(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 Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of each coating delivered to the applicator at the spray booths (SB1, ~~and~~ SB2, **and SB3**) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

- (b) 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:

- (a1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b2) 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.
- (e3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e5) 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.1.32 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (SB1, ~~and~~ SB2, **and SB3**) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.43 Preventive Maintenance Plan [326 IAC 1-6-3]

D.1.54 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

D.1.65 Particulate Control

In order to comply with Condition D.1.3, the dry particulate filter for particulate control shall be in operation and control emissions from Spray Booth SB1, ~~and~~ Spray Booth SB2, **and Spray Booth SB3** at all times that the spray booths are in operation.

D.1.76 Record Keeping Requirements

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

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

The Permittee owns and operates a stationary recreational vehicle metal chassis modification facility.

Source Address:	23208 Cooper Drive, Elkhart, Indiana 46514
General Source Phone Number:	(574) 293-1581
SIC Code:	3799 (Transportation Equipment, Not Classified Elsewhere)
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 Greenhouse Gases (GHGs) are less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

NOTE: 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.**

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 December 11, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 039-33976-00634. The staff recommends to the Commissioner that this MSOP Minor Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Joshua Levering 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) 234-6543 or toll free at 1-800-451-6027 extension 4-6543.
- (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

**Appendix A: Emission Calculations
Summary**

Company Name: MOR/ryde International, Inc.
Address City IN Zip: 23208 Cooper Drive, Elkhart, Indiana 46514
Minor Source Operating Permit No.: M039-30970-00634
Minor Permit Revision No.: 039-33976-00634
Reviewer: Joshua Levering
Date: Jan-14

Potential To Emit Before Controls (tons/year)												
Emission Unit ID	PM	PM10	PM2.5	SO ₂	NO _x	CO	VOC	GHG*	GHG**	Total HAPs	Worst Single HAP	
Spray Booth SB1	18.12	18.12	18.12	0	0	0	16.13	0	0	0	0	--
Spray Booth SB2	9.93	9.93	9.93	0	0	0	8.84	0	0	0	0	--
Spray Booth SB3	9.93	9.93	9.93	0	0	0	8.84	0	0	0	0	--
Stretch Line 1 (SL1)	0.52	0.52	0.52	0	0	0	0.47	0	0	0	0	--
Stretch Line 2 (SL2)	0.52	0.52	0.52	0	0	0	0.47	0	0	0	0	--
Cleanup Solvent SGC1, SGC2, SGC3	0	0	0	0	0	0	0.00	0	0	0	0	--
Welding W1 - W100	0.68	0.68	0.68	0	0	0	0	0	0	0.04	0.04	Manganese
Natural Gas Combustion	0.25	1.00	1.00	0.08	13.15	11.04	0.72	15,872.07	15,874.33	0.25	0.24	Hexane
Paved Roads	0.89	0.18	0.04	0	0	0	0	0	0	0.00	0.00	--
Totals	40.9	40.9	40.8	0.08	13.15	11.04	35.46	15,872.07	15,874.33	0.29	0.24	Hexane

Potential To Emit After Controls (tons/year)												
Emission Unit ID	PM	PM10	PM2.5	SO ₂	NO _x	CO	VOC	GHG*	GHG**	Total HAPs	Worst Single HAP	
Spray Booth SB1	3.62	3.62	3.62	0	0	0	16.13	0	0	0	0	--
Spray Booth SB2	1.99	1.99	1.99	0	0	0	8.84	0	0	0	0	--
Spray Booth SB3	1.99	1.99	1.99	0	0	0	8.84	0	0	0	0	--
Stretch Line 1 (SL1)	0.10	0.10	0.10	0	0	0	0.47	0	0	0	0	--
Stretch Line 2 (SL2)	0.10	0.10	0.10	0	0	0	0.47	0	0	0	0	--
Cleanup Solvent SGC1, SGC2, SGC3	0	0	0	0	0	0	0.00	0	0	0	0	--
Welding W1 - W100	0.68	0.68	0.68	0	0	0	0	0	0	0.04	0.04	Manganese
Natural Gas Combustion	0.25	1.00	1.00	0.08	13.15	11.04	0.72	15,872.07	15,874.33	0.25	0.24	Hexane
Paved Roads	0.89	0.18	0.04	0	0	0	0	0	0	0.00	0.00	--
Totals	9.63	9.67	9.53	0.08	13.15	11.04	35.46	15,872.07	15,874.33	0.29	0.24	Hexane

*CO₂e Total in tons/yr based on 11/29/2013 federal Global Warming Potentials (GWP)

**CO₂e Total in tons/yr based on 10/30/2009 federal Global Warming Potentials (GWP)

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

Company Name: MOR/ryde International, Inc.
Address City IN Zip: 23208 Cooper Drive, Elkhart, Indiana 46514
Minor Source Operating Permit No.: M039-30970-00634
Minor Permit Revision No.: 039-33976-00634
Reviewer: Joshua Levering
Date: Jan-14

Emission Unit Description (ID)	Material	Density (lbs/gal)	Weight % VOC	Weight % Solids	Maximum Usage (gal/unit)	Maximum Throughput (units/hour)	Pounds VOC per Gallon of Coating*	PTE of VOC (tons/year)	Transfer Efficiency	PTE of PM/PM10/PM2.5 Uncontrolled (tons/year)	Control Efficiency	PTE of PM/PM10/PM2.5 Controlled (tons/year)
Spray Booth #1 (SB1)	Nanochem 6569S1	10.70	32.8%	67.2%	1.75	0.66	3.20	16.13	50%	18.12	80%	3.62
Spray Booth #2 (SB2)	Nanochem 6569S1	10.70	32.8%	67.2%	0.85	0.74	3.20	8.84	50%	9.93	80%	1.99
Spray Booth #3 (SB3)	Nanochem 6569S1	10.70	32.8%	67.2%	0.85	0.74	3.20	8.84	50%	9.93	80%	1.99
Stretch Line 1 (SL1)	Nanochem 6569S1	10.70	32.8%	67.2%	0.05	0.66	3.20	0.47	50%	0.52	80%	0.10
Stretch Line 2 (SL2)	Nanochem 6569S1	10.70	32.8%	67.2%	0.05	0.66	3.20	0.47	50%	0.52	80%	0.10
TOTAL								34.74		39.03		7.81

* VOC lb/gal as calculated (density x wt% VOC) was on the high side. The MSDS listed and tested VOC (lb/gal) = 2.9; AIMS VOC = 3.2.

Emission Unit Description (ID)	Material**	Density (lbs/gal)	Weight % VOC	Annual Usage** (gal/year)	Maximum Annual Usage** (gal/year)	PTE of VOC (tons/year)
Spray Gun Cleanup (SGC1 - SGC3)	tert-Butyl Acetate	7.19	0%	780	2628	0.00

**tert-Butyl Acetate delisted as VOC

NOTES

* The source applies the coatings with low pressure air-atomized spray methods. Particulate emissions from the spray booths are controlled with dry filter. The coatings contain no HAPs.

** Based on experience at their other sources, MOR/ryde Intl. estimates they will use a maximum of 780 gallons cleanup solvent per year for 2,600 actual hours of operation per year. Maximum annual usage is based on 8760 hours of operation per year. Assume all solvent is volatilized. The cleanup solvent contains no HAPs.

METHODOLOGY

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

PTE of VOC (Spray Booths) (tons/year) = Density (lbs/gal) x Weight % VOC x Maximum Usage (gal/unit) x Maximum Throughput (units/hour) x 8760 hours/year x 1 ton/2,000 lbs

PTE of VOC (Cleanup) (tons/year) = Density (lbs/gal) x Weight % VOC x Maximum Annual Usage (gal/year) x 1 ton/2,000 lbs

PTE PM/PM10 Uncontrolled (tons/year) = Density (lbs/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hour) x (1- Transfer Efficiency %) x 8760 hours/year x 1 ton/2000 lbs

PTE PM/PM10 Controlled (tons/yr) = PTE PM/PM10 Uncontrolled (tons/year) x (1-Control Efficiency %)

Appendix A: Emission Calculations
Particulate and HAP Emissions from Welding Operations W1 - W50

Company Name: MOR/ryde International, Inc.
Address City IN Zip: 23208 Cooper Drive, Elkhart, Indiana 46514
Minor Source Operating Permit No.: M039-30970-00634
Minor Permit Revision No.: 039-33976-00634
Reviewer: Joshua Levering
Date: Jan-14

Type of Welder	# of Welding Stations	Electrode Usage Rate (lbs/hour/welder)	PM/PM10/PM2.5 Emission Factor (lbs PM10/1,000 lbs electrode)	Manganese Emission Factor (lbs Mn/1,000 lbs electrode)	PTE of PM/PM10/PM2.5 Uncontrolled (tons/year)	PTE of Manganese Uncontrolled (tons/year)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 Controlled (tons/year)	PTE of Manganese Controlled (tons/year)
MIG	100	0.3	5.2	0.318	0.68	0.042	0%	0.68	0.042

Emissions from the one hundred (100) welding stations are uncontrolled.

Assume all PM emissions are equal to PM10.

Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95). Electrode type is E70S-3.

Methodology

PTE PM/PM10/Mn Uncontrolled (tons/year) = # of Welding Stations x Electrode Usage Rate (lbs/hour/welder) x Emission Factor (lbs/1,000 lbs electrode) x 8760 hours/year x 1 ton/2,000 lbs

PTE PM/PM10/Mn Controlled (tons/year) = PTE PM/PM10/Mn Uncontrolled (tons/year) x (1 - Control Efficiency %)

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

Company Name: MOR/ryde International, Inc.
Address City IN Zip: 23208 Cooper Drive, Elkhart, Indiana 46514
Minor Source Operating Permit No.: M039-30970-00634
Minor Permit Revision No.: 039-33976-00634
Reviewer: Joshua Levering
Date: Jan-14

Emission Unit Description (ID)	# of Emission Units	Heat Input Capacity (MMBtu/hour)	Total Heat Input Capacity (MMBtu/hour)
Space Heaters (SH1 - SH4)	4	0.56	2.24
Air Make-up Units (AMU1 - AMU2)	2	7.0	14.00
Air Make-up Units (AMU3 - AMU4)	2	5.0	10.00
Air Make-up Units (AMU5 - AMU6)	2	0.56	1.12
Gas Furnaces (GF1, GF2)	2	0.06	0.12
Gas Furnace (GF3)	1	0.10	0.10
Gas Furnace (GF4)	1	0.04	0.04
Spray Booth Heaters (SBH1 - SBH2)	2	1.50	3.00
Total Heat Input			30.62

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
30.62	1020	263.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.25	1.00	1.00	0.08	13.15	0.72	11.04

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

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/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	2.761E-04	1.578E-04	9.861E-03	2.367E-01	4.471E-04	2.474E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	6.574E-05	1.446E-04	1.841E-04	4.996E-05	2.761E-04	7.205E-04
					Total HAPs	2.481E-01
					Worst HAP	2.367E-01

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.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	15,778	0.3	0.3
Summed Potential Emissions in tons/yr	15,779		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	15,872		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	15,874		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
 CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: MOR/ryde International, Inc.
Address City IN Zip: 23208 Cooper Drive, Elkhart, Indiana 46514
Minor Source Operating Permit No.: M039-30970-00634
Minor Permit Revision No.: 039-33976-00634
Reviewer: Joshua Levering
Date: Jan-14

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employee Vehicles (entering plant) (one-way trip)	60.0	1.0	60.0	2.0	120.0	340	0.064	3.9	1410.2
Production Vehicles (entering plant) (one-way trip)	50.0	1.0	50.0	3.0	150.0	1955	0.370	18.5	6757.3
Totals			110.0		270.0			22.4	8167.6

Average Vehicle Weight Per Trip =

2.5

 tons/trip
Average Miles Per Trip =

0.20

 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^{0.91} * (W)^{1.02}] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.5	2.5	2.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p =

120

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.217	0.043	0.0107	lb/mile
Mitigated Emission Factor, Eext =	0.199	0.040	0.0098	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Employee Vehicles (entering plant) (one-way trip)	0.15	0.03	0.01	0.14	0.03	0.01	0.14	0.03	0.01
Production Vehicles (entering plant) (one-way trip)	0.73	0.15	0.04	0.67	0.13	0.03	0.67	0.13	0.03
Totals	0.89	0.18	0.04	0.81	0.16	0.04	0.81	0.16	0.04

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
Commissioner

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

TO: Ben Paulus
MOR/ryde International, Inc.
23208 Cooper Drive
Elkhart, IN 46514

DATE: January 30, 2014

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

SUBJECT: Final Decision
Minor Permit Revision to MSOP
039-33976-00634

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:
R. Scott Liggett, Consultant
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	PWAY 1/30/2014 Mor/Rvde International, Inc 039-33976-00634 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Ben Paulus Mor/Ryde International, Inc 23208 Cooper Dr Elkhart IN 46514 (Source CAATS)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
5		R. Scott Liggett, 2101 Lincolnway East, Mishawaka, IN 46544									
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