



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: June 12, 2014

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

Source Name: Bison Horse Trailers, LLC

Permit Level: Minor Source Operating Permit (MSOP) Administrative Amendment

Permit Number: 085-34561-00095

Source Location: 805 South Higbee Street, Milford, Indiana

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34561.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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.



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Michael R. Pence
Governor

Thomas W. Easterly
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Dan Miller
Bison Horse Trailers, LLC
PO Box 533
Wakarusa, IN 46573

June 12, 2014

Re: 085-34561-00095
Administrative Amendment to
M085-29906-00095

Dear Mr. Miller:

Bison Horse Trailers, LLC was issued a Minor Source Operating Permit (MSOP) Renewal No. M085-29906-00095 on May 18, 2011 for a stationary livestock trailer superstructure manufacturing plant located at 804 South Higbee Street and 802 N. Old State Road 15, Milford, IN 46542. On May 22, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to add eight new space heaters and four new welders along with relocating the living quarters assembly operation and woodworking operation to a new building.

Pursuant to the provisions of 326 IAC 2-6.1-6(d), the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this amendment:

Attachment A: 40 CFR 63, Subpart CCCCC, NESHAP for Source Category: Gasoline Dispensing Facilities

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Celeste Wanner of my staff at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376.

Sincerely,


Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and TSD

JA/CW

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



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Michael R. Pence
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Commissioner

Minor Source Operating Permit Renewal Permit OFFICE OF AIR QUALITY

**Bison Horse Trailers, LLC
804 South Higbee Street
802 N. Old State Road 15
Milford, Indiana 46542**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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.: M085-29906-00095	
Issued by: Original Signed Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: May 18, 2011 Expiration Date: May 18, 2021

Administrative Amendment No. 085-33884-00095, issued on January 21, 2014.

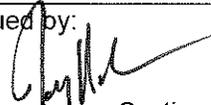
Administrative Amendment No.: 085-34561-00095	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 12, 2014 Expiration Date: May 18, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary livestock trailer superstructure manufacturing plant.

Source Address:	804 South Higbie Street, Milford, Indiana 46542
General Source Phone Number:	(574) 862-7211
SIC Code:	3715
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 MSOP Source Definition [326 IAC 1-2-73]

This livestock trailer superstructure manufacturing plant consists of two (2) plants:

- (a) Plant 1 is located at 804 S Higbee St., Milford, IN 46542; and
- (b) Plant 2 is located at 802 N. Old State Road 15, Milford, IN 46542.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, plant 2 supports plant 1, and under common control of the same entity, they will be considered one (1) source.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth operation, identified as PB1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to stacks Paint SV1 and Paint SV2.
- (b) One (1) trim/assembly operation, identified as Assembly 1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour using wipe and airless spray for application, using no control and exhausting inside the building.
- (c) One (1) living quarters assembly operation, identified as LQ1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour, using wipe, spray cans and extrusion for application, using no controls and exhausting inside the building.
- (d) One (1) undercoating operation, identified as Undercoating 1, constructed in 2006, with a maximum capacity of 0.60 metal horse trailers per hour using air assisted pump, where the coating does not reach an aerosolized state, using no controls and exhausting inside the building.

- (e) One (1) metal cutting operation using cutting coolant, identified as Metal 1, constructed in 2003, with a maximum capacity of 500 pounds of metal per trailer, using no controls and exhausting inside the building.
- (f) One (1) woodworking operation, identified as woodworking, constructed in 2003, with a maximum capacity of 5,063 pounds per hour, using no controls and exhausting inside the building.
- (g) One (1) gasoline storage tank, identified as Gas Tank 1, constructed in 2003, with a capacity of 250 gallons.
- (h) One (1) #2 distillate fuel oil storage tank, identified as Diesel Tank 1, constructed in 2003, with a capacity of 250 gallons.
- (i) One (1) welding operation, identified as MIG Welding, constructed in 2003, consisting of fifteen (15) metal inert gas (MIG) welding stations, with a maximum capacity of 30.0 pounds of wire per hour total, exhausting inside the building.
- (j) One (1) welding operation, identified as TIG Welding, constructed in 2005, consisting of four (4) tungsten inert gas (TIG) welding stations, with a maximum capacity of 0.41 pounds of wire per hour total, exhausting inside the building.
- (k) One (1) natural gas-fired paint booth air make-up unit, identified as PA1, constructed in 2003, rated at 3.888 MMBtu/hr, exhausting to stack Paint SV1 and Paint SV2,.
- (l) Twenty (20) natural gas-fired space heaters, constructed in 2003, rated at 0.075 million MMBtu/hr, each.
- (m) One (1) natural gas-fired power washer, identified as Power Washer 1, constructed in 2003, rated at 0.44 MMBtu/hr.
- (n) One (1) natural gas-fired office air make-up unit, identified as Air Make-Up, constructed in 2003, rated at 0.15 MMBtu/hr, exhausting inside the building.
- (o) Four (4) welding operations, identified as AL1-AL4, installed in 2014, each with a maximum capacity of 1.5 pounds of electrode consumed per hour.
- (p) Eight (8) radiant space heaters identified as RS1-RS8, installed in 2014, each with a heat input rating of 0.20 MMBtu/hour, and exhausting to stacks RS1S-RS8S.

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, M085-29906-00095, 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 M085-29906-00095 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.

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) paint booth operation, identified as PB1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to stacks Paint SV1 and Paint SV2.
- (b) One (1) trim/assembly operation, identified as Assembly 1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour using wipe and airless spray for application, using no control and exhausting inside the building.
- (c) One (1) living quarters assembly operation, identified as LQ1, constructed in 2003, with a maximum capacity of 0.60 metal horse trailers per hour, using wipe, spray cans and extrusion for application, using no controls and exhausting inside the building.
- (d) One (1) undercoating operation, identified as Undercoating 1, constructed in 2006, with a maximum capacity of 0.60 metal horse trailers per hour using air assisted pump, where the coating does not reach an aerosolized state, using no controls and exhausting inside the building.

(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]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at each of the one (1) paint booth, identified as PB1, the one (1) trim/assembly operation, identified as Assembly 1, and the one (1) living quarters assembly operation, identified as LQ1.

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

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

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

- (a) Particulate from the one (1) paint booth operation, identified as PB1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the one (1) paint booth operation, identified as PB1, and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content 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.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on each of the one (1) paint booth, identified as PB1, the one (1) trim/assembly operation, identified as Assembly 1, and the one (1) living quarters assembly operation, identified as LQ1, on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

Note: The daily volume weighted average of the coatings used is determined for each booth or operation.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and
 - (5) The total VOC usage for each day
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with Condition D.1.3.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) metal cutting operation using cutting coolant, identified as Metal 1, constructed in 2003, with a maximum capacity of 500 pounds of metal per trailer, using no controls and exhausting inside the building.
- (f) One (1) woodworking operation, identified as woodworking, constructed in 2003, with a maximum capacity of 5,063 pounds per hour, using no controls and exhausting inside the building.
- (g) One (1) gasoline storage tank, identified as Gas Tank 1, constructed in 2003, with a capacity of 250 gallons.
- (h) One (1) #2 distillate fuel oil storage tank, identified as Diesel Tank 1, constructed in 2003, with a capacity of 250 gallons.
- (i) One (1) welding operation, identified as MIG Welding, constructed in 2003, consisting of fifteen (15) metal inert gas (MIG) welding stations, with a maximum capacity of 30.0 pounds of wire per hour total, exhausting inside the building.
- (j) One (1) welding operation, identified as TIG Welding, constructed in 2005, consisting of four (4) tungsten inert gas (TIG) welding stations, with a maximum capacity of 0.41 pounds of wire per hour total, exhausting inside the building.
- (k) One (1) natural gas-fired paint booth air make-up unit, identified as PA1, constructed in 2003, rated at 3.888 MMBtu/hr, exhausting to stack Paint SV1 and Paint SV2,.
- (l) Twenty (20) natural gas-fired space heaters, constructed in 2003, rated at 0.075 million MMBtu/hr, each.
- (m) One (1) natural gas-fired power washer, identified as Power Washer 1, constructed in 2003, rated at 0.44 MMBtu/hr.
- (n) One (1) natural gas-fired office air make-up unit, identified as Air Make-Up, constructed in 2003, rated at 0.15 MMBtu/hr, exhausting inside the building.
- (o) Four (4) welding operations, identified as AL1-AL4, installed in 2014, each with a maximum capacity of 1.5 pounds of electrode consumed per hour.
- (p) Eight (8) radiant space heaters identified as RS1-RS8, installed in 2014, each with a heat input rating of 0.20 MMBtu/hour, and exhausting to stacks RS1S-RS8S.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) woodworking operation shall not exceed 7.63 pounds per hour when operating at a process weight rate of 5,063 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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

D.2.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Natural gas-fired space heaters		0.6
Radiant space heaters	RS1-RS8	0.6

SECTION E.1

NESHAP

Emission Unit Description:

- (g) One (1) gasoline storage tank, identified as Gas Tank 1, constructed in 2003, with a capacity of 250 gallons.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-6.1-5 (a)]**

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

- (a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the above listed emissions units, as specified in 40 CFR Part 63, Subpart CCCCCC, in accordance with the schedule in 40 CFR 63 Subpart CCCCCC.

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

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

and

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

E.1.2 Gasoline Dispensing Facilities NESHAP [40 CFR Part 63, Subpart CCCCCC]

Pursuant to CFR Part 63, Subpart CCCCCC, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A of this permit) for the above listed emissions units, as specified as follows:

- (1) 40 CFR 63.11110
- (2) 40 CFR 63.11111(a)
- (3) 40 CFR 63.11111(b)
- (4) 40 CFR 63.11111(e)
- (5) 40 CFR 63.11111(h)
- (6) 40 CFR 63.11111(i)
- (7) 40 CFR 63.11111(j)
- (8) 40 CFR 63.11112
- (9) 40 CFR 63.11113(f)(1)
- (10) 40 CFR 63.11115
- (11) 40 CFR 63.11116
- (12) 40 CFR 63.11130
- (13) 40 CFR 63.11131

- (14) 40 CFR 63.11132
- (15) Table 3 to Subpart CCCCCC of Part 63

**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:	Bison Horse Trailers, LLC
Address:	804 South Higbie Street
City:	Milford, Indiana 46542
Phone #:	(574) 862-7211
MSOP #:	M085-29906-00095

I hereby certify that Bison Horse Trailers, LLC is :

still in operation.

no longer in operation.

I hereby certify that Bison Horse Trailers, LLC is :

in compliance with the requirements of MSOP M085-29906-00095.

not in compliance with the requirements of MSOP M085-29906-00095.

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 an Administrative Amendment
to a Minor Source Operating Permit (MSOP)

Source Description and Location
--

Source Name:	Bison Horse Trailers, LLC
Source Location:	804 South Higbee Street, Milford, Indiana 46542
County:	Kosciusko
SIC Code:	3715
Operation Permit No.:	M 085-22906-00095
Operation Permit Issuance Date:	May 18, 2011
Administrative Amendment No.:	085-34561-00095
Permit Reviewer:	Celeste Wanner

On May 22, 2014, the Office of Air Quality (OAQ) received an application from Bison Horse Trailers, LLC related to a modification to an existing livestock trailer superstructure manufacturing plant.

Source Definition

This source consists of the following plants:

- (a) The existing plant located at 804 S Higbee St., Milford, IN 46542, Plant ID: 085-00095; and
- (b) A new plant located at 802 N. Old State Road 15, Milford, IN 46542.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same two-digit SIC Code; and
- (3) The plants must be located on the same, contiguous or adjacent properties.

Bison Horse Trailers, LLC owns both plants, meeting the first part of the source definition in 326 IAC 1-2-73. The plants have the same two-digit SIC Code, 37, for the Major Group Transportation Equipment. A plant is a support facility to another plant if it sends 50% or more of its output to the other plant. The Old State Road plant will send all of its output to the Higbee Street plant. The plants have a support relationship, as well as the same two-digit SIC Code, meeting the second part of the source definition.

These plants are located on separate properties, less than two miles apart. Since the plants are not on the same property or contiguous properties, IDEM has evaluated whether the plants are on adjacent properties. All evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the properties, IDEM asks:

- (1) Are materials routinely transferred between the plants?
- (2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
- (3) Is the production process itself split in any way between the plants?

The company's business plan is to relocate the living quarters assembly operation and miscellaneous woodworking operation at the Higbee Street plant to the Old State Road plant. The two plant properties are less than 2 miles (1.42) miles apart. The production process will be split with the living quarters assembled at the new plant all going to the existing plant. Plant managers and supervisors will be the same for both plants. Considering all these factors, IDEM, OAQ finds that the two plants are located on adjacent properties, meeting the third part of the source definition.

Therefore, based on this evaluation these plants will be considered one (1) source, as defined by 326 IAC 1-2-73.

Existing Approvals

The source was issued MSOP Renewal No. M085-22906-00095 on May 18, 2011. The source has since received Administrative Amendment No. 085-33884-00095, issued on January 21, 2014.

County Attainment Status

The source is located in Kosciusko 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 Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. Kosciusko 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}**
 Kosciusko 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. 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.
- (c) **Other Criteria Pollutants**
 Kosciusko County has been classified as attainment or unclassifiable in Indiana for all 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 amendment, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of M085-22906-00095 issued on May 18, 2011.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Amendment (tons/year)*									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Coating & Assembly	26.06	26.06	26.06	--	--	74.33	--	--	14.64	6.83 (xylenes)
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--	--
Welding	0.73	0.73	0.73	--	--	--	--	--	6.66E-02	--
Combustion	4.88E-02	0.195	0.195	1.54E-02	2.57	0.141	2.16	3,099	4.84E-02	--
Total PTE of Entire Source	43.27	43.42	43.42	1.54E-02	2.57	74.47	2.16	3,099	14.75	6.83
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA	NA
negl. = negligible *These emissions are based upon M085-22906-00095 **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 Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bison Horse Trailers, LLC on May 22, 2014, relating to the purchase of another building and property. As part of this purchase there is a relocation of the living quarters assembly operation and woodworking operation, as well as the addition of eight space heaters and four new welders.

The following is a list of the new emission units:

- (a) Four (4) welding operations, identified as AL1-AL4, installed in 2014, each with a maximum capacity of 1.5 pounds of electrode consumed per hour.
- (b) Eight (8) radiant space heaters identified as RS1-RS8, installed in 2014, each with a heat input rating of 0.20 MMBtu/hour, and exhausting to stacks RS1S-RS8S.

Enforcement Issues

There are no pending enforcement actions related to this permitting action.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Administrative Amendment

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 amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Amendment (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Welding	0.63	0.63	0.63	--	--	--	--	--	1.16E-03	
Combustion	0.01	0.05	0.05	4.12E-03	0.69	0.04	0.58	829	0.01	1.237E-02 (Hexane)
Total	0.65	0.69	0.69	4.12E-03	0.69	0.04	0.58	829	0.01	1.237E-02
negl. = negligible										

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add an emissions unit, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

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 to accommodate the Proposed Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP (Xylene)
Coating & Assembly	26.06	26.06	26.06	--	--	74.33	--	--	14.64	6.83
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--	--
Welding	0.73 1.37	0.73 1.37	0.73 1.37	--	--	--	--	--	6.66E-02 6.75E-02	--
Combustion	4.88E-02 6.18E-02	0.195 0.25	0.195 0.25	1.54E-02 1.95E-02	2.57 3.25	0.141 0.18	2.16 2.73	3,099 3,929	4.84E-02 6.14E-02	--
Total PTE of Entire Source	43.27 43.92	43.42 44.10	43.42 44.10	1.54E-02 1.95E-02	2.57 3.25	74.47 74.51	2.16 2.73	3,099 3,929	14.75 14.77	6.83
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **The 100,000 CO 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.										

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only

after issuance of this MSOP permit amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e* *	Total HAPs	Worst Single HAP (Xylene)
Coating & Assembly	26.06	26.06	26.06	--	--	74.33	--	--	14.64	6.83
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--	--
Welding	1.37	1.37	1.37	--	--	--	--	--	6.75E-02	--
Combustion	6.18E-02	0.25	0.25	1.95E-02	3.25	0.18	2.73	3,929	6.14E-02	--
Total	43.92	44.10	44.10	1.95E-02	3.25	74.51	2.73	3,929	14.77	6.83
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **The 100,000 CO 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 amendment 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 amendment 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 amendment 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included for this proposed amendment, since this source is an area source of HAPs, not a major source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers, 40 CFR 63.11193, Subpart JJJJJJ are not included for this proposed amendment, since space heaters are not boilers.
- (d) 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 amendment.

Compliance Assurance Monitoring (CAM)

- (e) 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 amendment:

- (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:
 - (1) The potential to emit of all PSD regulated pollutants, excluding GHGs, from the entire source will continue to be less than the PSD major source threshold levels.
 - (2) The GHG emissions from the entire source will continue to be less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per yearTherefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The proposed amendment is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new 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 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)**
 Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

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

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

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

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

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

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Natural Gas Space Heaters	2003	20*0.075	5.538	0.698	0.6	0.002
RS1-RS8	2014	8*0.20	7.138	0.654	0.6	0.002

Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

- (g) **326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**
 The proposed amendment is not subject to 326 IAC 6-2. The additional eight space heaters identified as RS1-RS8 are sources of indirect heating and are exempt pursuant to 326 IAC 6-3-1(b)(1). The four MIG welders identified as AL1-AL4 consume less than 625 pounds of rod or wire per day and are exempt pursuant to 326 IAC 6-3-1(b)(9).
- (h) **326 IAC 7 (Sulfur Dioxide Emission Limitations)**
 Pursuant to 326 IAC 7-1.1-1, the emissions units added as part of this amendment have a potential to emit less than 25 tons per year or 10 pounds per hour of sulfur dioxide and therefore are exempt from this rule.
- (i) **326 IAC 8-1-6 (New facilities; general reduction requirements)**
 Pursuant to 326 IAC 8-1-6(1) the emission units added as part of the amendment have potential emissions less than 25 tons per year of VOCs and are therefore exempt from this rule.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 085-29906-00095, issued on May 18, 2011.

Proposed Changes

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

Summary of IDEM Updates Throughout the Permit

- (a) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.
- (b) **Section C- General Reporting Requirements**
IDEM, OAQ has clarified Section C - General Reporting Requirements.

Section A - Amendments

- (a) Condition A.2 has been added to include the new source determination for Bison Horse Trailers, LLC. The remaining A conditions have been renumbered to accommodate this change.
- (b) Condition A.3 has been updated to include the four new welders and eight new space heaters.

Section A has been Amended as follows:

SECTION A SOURCE SUMMARY

A.2 MSOP Source Definition [326 IAC 1-2-73]

This livestock trailer superstructure manufacturing plant consists of two (2) plants:

- (a) **Plant 1 is located at 804 S Higbee St., Milford, IN 46542; and**
- (b) **Plant 2 is located at 802 N. Old State Road 15, Milford, IN 46542.**

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, plant 2 supports plant 1, and under common control of the same entity, they will be considered one (1) source.

A.23 Emission Units and Pollution Control Equipment Summary

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

- (o) **Four (4) welding operations, identified as AL1-AL4, installed in 2014, each with a maximum capacity of 1.5 pounds of electrode consumed per hour.**
- (p) **Eight (8) radiant space heaters identified as RS1-RS8, installed in 2014, each with a heat input rating of 0.20 MMBtu/hour, and exhausting to stacks RS1S-RS8S.**

Section B and Section C - Amendments

Section B and Section C have been revised to incorporate the appropriate IDEM updates details above under "Summary of IDEM Updates Throughout the Permit."

Section B and Section C have been Amended as follows:

SECTION B GENERAL CONDITIONS

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:

- (bc) ***

- (ed) ***

SECTION C SOURCE OPERATION CONDITIONS

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

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

Section D.1 - Amendments

- (a) The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (b) The first subheader has been revised to more accurately reflect the type of conditions that follow it.

- (a) The rule cite for condition D.1.1 has been corrected.

Section D.1 has been Amended as follows:

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] ~~Compliance Determination Requirements~~

D.1.1 Volatile Organic Compounds (VOC) [326 IAC ~~8-2-9 8-1-2~~]

D.1.7 Record Keeping Requirements

- (a) To document **the** compliance **status** with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.

- (b) To document **the** compliance **status** with Condition D.1.3, the Permittee shall maintain records in accordance with Condition D.1.3.

- (c) ***

Section D.2 - Amendments

- (a) The emission unit descriptions have been updated to include the new units.
- (b) D.2.2 has been added to include the requirements of 326 IAC 6-2-4 for the space heaters.

Section D.2 has been Amended as follows:

(o) Four (4) welding operations, identified as AL1-AL4, installed in 2014, each with a maximum capacity of 1.5 pounds of electrode consumed per hour.
(p) Eight (8) radiant space heaters identified as RS1-RS8, installed in 2014, each with a heat input rating of 0.20 MMBtu/hour, and exhausting to stacks RS1S-RS8S.

D.2.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Natural gas-fired space heaters		0.6
Radiant space heaters	RS1-RS8	0.6

E Sections Amendments

- (a) IDEM, OAQ has revised the language in the E conditions to clarify the intent.

Section E.1 has been Amended as follows:

SECTION E.1 ~~EMISSION UNIT OPERATION CONDITIONS~~ **NESHAP**

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-6.1-5 (a)]

E.1.1 ~~General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities~~ **under 40 CFR Part 63** [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the ~~affected source~~ **above listed emissions units**, as specified in ~~Appendix A of 40 CFR Part 63, Subpart CCCCCC~~, in accordance with the schedule in 40 CFR 63 Subpart CCCCCC.

(b) ***
and

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

E.1.2 ~~National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities~~ **NESHAP** [40 CFR Part 63, Subpart CCCCCC]

Pursuant to CFR Part 63, Subpart CCCCCC, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A of this permit) for the ~~affected source~~ **above listed emissions units**, as specified as follows:

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 May 22, 2014.

This proposed amendment shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No. 085-34561-00095. The staff recommends to the Commissioner that this MSOP Administrative Amendment be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Celeste Wanner 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) 234-5376 or toll free at 1-800-451-6027 extension 4-5376.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
 802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO _{2e}	Total HAPs
Coating & Assembly	26.06	26.06	26.06	--	--	74.33	--	--	14.63837415
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--
Welding	1.37	1.37	1.37	--	--	--	--	--	6.75E-02
Combustion	6.18E-02	0.25	0.25	1.95E-02	3.25	0.18	2.73	3,929	6.14E-02
Total	43.92	44.10	44.10	1.95E-02	3.25	74.51	2.73	3,929	14.77

* PM2.5 listed is direct PM2.5

Potential to Emit after Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO ₂	Total HAPs
Coating & Assembly	4.05	4.05	4.05	--	--	74.33	--	--	14.64
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--
Welding	1.37	1.37	1.37	--	--	--	--	--	6.75E-02
Combustion	6.18E-02	2.47E-01	2.47E-01	1.95E-02	3.25	0.18	2.73	3,929	6.14E-02
Total	21.90	22.09	22.09	1.95E-02	3.25	74.51	2.73	3,929	14.77

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO ₂	Total HAPs
Coating & Assembly	26.06	26.06	26.06	--	--	74.33	--	--	14.64
Woodworking	16.43	16.43	16.43	--	--	--	--	--	--
Welding	1.37	1.37	1.37	--	--	--	--	--	6.75E-02
Combustion	6.18E-02	0.25	0.25	1.95E-02	3.25	0.18	2.73	3.93E+03	6.14E-02
Total	43.92	44.10	44.10	1.95E-02	3.25	74.51	2.73	3,929	14.77

* PM2.5 listed is direct PM2.5

**Appendix A: Emissions Calculations
Hazardous Air Pollutant Summary**

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
 802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Uncontrolled Potential to Emit (tons/yr)				
Emission Unit	Coating & Assembly	Welding & Cutting	Natural Gas Combustion	Total HAP ¹
Organic HAPs				
Benzene			6.83E-05	6.83E-05
Dichlorobenzene			3.90E-05	3.90E-05
Formaldehyde			2.44E-03	2.44E-03
n-Hexane			5.86E-02	5.86E-02
Toluene	5.56		1.11E-04	5.56
Xylenes	6.83			6.83
Ethylbenzene	0.65			0.65
MDI ²	1.61			1.61
Inorganic HAPs				
Lead			1.63E-05	1.63E-05
Cadmium			3.58E-05	3.58E-05
Chromium		2.63E-04	4.56E-05	3.08E-04
Manganese		6.75E-02	1.24E-05	6.75E-02
Nickel			6.83E-05	6.83E-05
Total Emissions	14.64	6.78E-02	6.14E-02	14.77

Potential to Emit after Issuance (tons/yr)				
Emission Unit	Coating & Assembly	Welding & Cutting	Natural Gas Combustion	Total HAP
Organic HAPs				
Benzene			6.83E-05	6.83E-05
Dichlorobenzene			3.90E-05	3.90E-05
Formaldehyde			2.44E-03	2.44E-03
n-Hexane			5.86E-02	5.86E-02
Toluene	5.56		1.11E-04	5.56
Xylenes	6.83			6.83
Ethylbenzene	0.65			0.65
MDI	1.61			1.61
Inorganic HAPs				
Lead			1.63E-05	1.63E-05
Cadmium			3.58E-05	3.58E-05
Chromium		2.63E-04	4.56E-05	3.08E-04
Manganese		6.75E-02	1.24E-05	6.75E-02
Nickel			6.83E-05	6.83E-05
Total Emissions	14.64	6.78E-02	6.14E-02	14.77

1. Total HAP column included worst case value from natural gas or fuel oil boiler columns
 2. MDI - methylene bisphenyl diisocyanate

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

Company Name: **Bison Horse Trailers, LLC**
 Address City IN Zip: **804 South Higbee (SR 15), Milford, Indiana 46542**
802 N. Old State Road 15, Milford, Indiana 46542
 MSOP AA: **085-34561-00095**
 Reviewer: **Celeste Wanner**
 Date: **6/2/2014**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Material Coated
Surface Coating (PB1)																	
Diamond Vogel Paint, Pt. A VLX14941-01, gallons	11.50	24.0%		24.0%		76.0%	2.0600	0.60	2.81	2.76	3.41	81.9	14.94	11.83	3.63	75.0%	Metal
Diamond Vogel Plural Activator IG-0267, gallons	8.24	42.0%		42.0%		58.0%	0.6300	0.60	3.50	3.46	1.31	31.4	5.73	1.98	5.97	75.0%	Metal
Diamond Vogel Primer, Pt. A VLX15213-04, gallons	12.32	27.0%		27.0%		63.0%	1.0900	0.60	3.54	3.33	2.18	52.2	9.53	6.44	5.28	75.0%	Metal
Diamond Vogel Accelerator, DV 726-025, quarts	6.90	94.0%		94.0%		6.0%	0.0018	0.60	6.51	6.49	0.01	0.2	0.03	0.00	108.10	75.0%	Metal
Sherwin Williams URE-BLEND Blending Solvent, quarts	7.17	96.0%		96.0%		4.0%	0.0018	0.60	6.87	6.88	0.01	0.2	0.03	0.00	172.08	75.0%	Metal
Natcon A Resin B Resin ISO	9.28	1.0%		1.0%		99.0%	7.5000	0.60	0.0020	0.09	0.42	10.0	1.83	0.00	0.09	100.0%	Metal

*Only one (1) coating is applied at a time.
 State Potential Emissions

PM Control Efficiency:										80.0%	7.33	175.84	32.09	20.25				
Add worst case coating to all solvents											Uncontrolled	7.33	175.8	32.09	20.25			
											Controlled	7.33	175.8	32.09	4.050			

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Material Coated
Trim/Assembly																	
Manus Prod 76AM Permathane Sealant (drums)	14.18	0.70%		0.70%		99.0%	2.3700	0.60	0.083	0.099	0.141	3.388	0.618	0.00	0.100	100%	Metal
RS Hughes 3M Tape Primer 94, gallons	6.84	97.0%		97.00%		3.00%	0.5400	0.60	0.430	0.430	0.139	3.344	0.610	0.00	221.160	100%	Metal
Manus Prod 73A 10.1 oz Silicone (20% total usage)	8.61	29.0%		29.00%		70.00%	0.1800	0.60	0.300	2.497	0.270	6.472	1.181	0.00	3.567	100%	Metal
BBC Dist Geocel RP 400, 10 oz	9.02	23.0%		23.00%		76.0%	0.0600	0.60	2.090	2.075	0.075	1.792	0.327	0.00	2.730	100%	Metal
Manus Prod 75AM Prep Caulking, 10.1 oz. tubes tr	14.18	1.0%		1.00%		99.00%	0.1400	0.60	0.075	0.142	0.012	0.286	0.052	0.00	0.143	100%	Metal
RS Hughes 3m Undercoat 051135-08881, 20 oz. (90% total usage)	9.17	39.0%		39.00%		60.00%	0.3900	0.60	3.615	3.576	0.837	20.085	3.665	1.43	5.961	75%	Metal
RW Mobile Seymour MRO Spray Paint 620-1415, 20 oz. (90% total usage)	6.67	27.7%		27.70%		71.30%	0.3800	0.60	2.310	1.848	0.421	10.110	1.845	1.20	2.591	75%	Metal
Russell Products 690 Spray Adhesive 16 oz., 12 per case (80% total usage)	5.84	67.8%		67.83%		17.20%	0.0400	0.60	3.969	3.961	0.095	2.282	0.416	0.00	23.031	100%	Wood/Vinyl
SikaFlex 252 Sealant, Unipack 20 oz.	10.01	5.5%		5.48%		93.0%	1.9800	0.60	0.549	0.549	0.652	15.646	2.855	0.00	0.590	100%	Metal/Vinyl
SikaFlex 3121, 490 ml cartridge (3785 ml = 1 gal)	8.30	5%		5.00%		95.00%	0.0300	0.60	0.430	0.415	0.007	0.430	0.033	0.00	0.437	100.0%	Metal/Vinyl
SikaFlex 205 425050 Primer, 5 gals	6.59	73%		73.00%		27.00%	0.3900	0.60	6.458	4.811	1.126	27.017	4.931	0.00	17.817	100.0%	Metal/Vinyl
LaSalle Sta Put Contact Adhesive SP8027C, 27 lb. canister (3.43 gal/cylinder)	7.96	5%		5.00%		29.00%	0.0400	0.60	0.023	0.398	0.010	0.229	0.042	0.20	1.372	75.0%	Metal/Vinyl
RW Spray Paints (Bison White, Grey, etc.), 14 oz. (30% total usage)	7.01	44%		44.00%		31.00%	0.4100	0.60	4.660	3.084	0.759	18.210	3.323	1.06	9.950	75.0%	Wood/Metal
RW Allpro Chrome Aluminum 11056 Spray Paint, 20 oz. (90% total usage)	6.19	80%		80.00%		16.10%	0.1400	0.60	4.990	4.952	0.416	9.983	1.822	0.11	30.758	75.0%	Wood/Metal/Vinyl
Alco Cyclo C-34 White Grease, 11 oz. (60% of total usage)	6.67	63.0%		63.00%		37.0%	0.0110	0.60	4.202	4.202	0.028	0.666	0.121	0.00	11.357	100.0%	metal
Rollie Williams GPB988 Self Etching Primer, 12 oz. (30% total usage)	6.68	48.0%		48.00%		18.0%	0.0090	0.60	3.740	3.206	0.017	0.416	0.076	0.02	17.813	75%	Wood/Metal/Vinyl

State Potential Emissions

PM Control Efficiency:											5.004	120.355	21.919	4.03			
Add worst case coating to all solvents																	

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Material Coated
Schnee-Morehead 6104 Permathane Sealant (10.1 oz tubes)	13.04	0.28%		0.28%		99.00%	0.0300	0.60	0.390	0.037	0.001	0.016	0.003	0.00	0.037	100%	Metal
Schnee-Morehead 5732 10.1 oz Silicone (80% total usage)	8.68	5.00%		5.00%		95.00%	0.8600	0.60	0.430	0.434	0.224	5.375	0.981	0.00	0.457	100%	Metal
RS Hughes 3m Undercoat 051135-08881, 20 oz. (90% total usage)	9.17	39.0%		39.00%		60.00%	0.3900	0.60	3.615	3.576	0.837	20.085	3.665	1.43	5.961	75%	Metal
RW Seymour MRO Spray Paint 620-1415, 20 oz. (10% total usage)	6.67	70.00%		70.00%		30.00%	0.0400	0.60	2.310	4.669	0.112	2.689	0.491	0.05	15.563	75%	Metal
Russell Products 690 Spray Adhesive 16 oz., 12 per case (80% total usage)	5.84	67.8%		67.83%		17.20%	0.0400	0.60	3.969	3.961	0.095	2.282	0.416	0.05	23.031	75%	wood/vinyl
RW Spray Paints (Bison White, Grey, etc.), 14 oz. (70% total usage)	7.01	66.00%		66.00%		34.00%	0.0600	0.60	4.660	4.627	0.167	3.997	0.730	0.09	13.608	75%	Metal
D Carter Oatey Great White Pipe Joint Compound w. PTFE (16 oz.)	16.69	25.00%		25.00%		75.00%	0.0010	0.60	0.025	4.173	0.003	0.060	0.011	0.00	5.563	100%	plastic
D Carter Tylan Outdoor & RV PRO Expanding Poly Straw Foam Sealant, 32	10.00	24.00%		24.00%		76.00%	0.2300	0.60	2.400	2.400	0.331	7.949	1.451	0.00	3.158	100%	Metal
RW Allpro Chrome Aluminum 11056 Spray Paint, 20 oz. (10% total usage)	6.19	80.00%		80.00%		16.00%	0.1700	0.60	4.990	4.952	0.505	12.122	2.212	0.14	30.950	75%	Metal
Alco Cyclo C-34 White Grease, 11 oz. (40% total usage)	6.67	63.00%		63.00%		37.00%	0.0070	0.60	4.202	4.202	0.018	0.424	0.077	0.00	11.357	100%	Metal
Rollie Williams GPB988 Self Etching Primer, 12 oz. (30% total usage)	6.68	48.00%		48.00%		18.0%	0.0090	0.60	3.740	3.206	0.017	0.416	0.076	0.02	17.813	75%	Metal
Clean up Solvents																	
MW Mobile MEK	6.72	100.00%		100.00%		0.00%	0.0250	0.60	6.720	6.720	0.101	2.419	0.442	0.00	-	-	cleaner
MW Mobile Isopropyl Alcohol	6.6	100.00%		100.00%		0.00%	0.4800	0.60	6.550	6.550	1.886	45.274	8.262	0.00	-	-	cleaner
Natcon IM PEMCO cleaner	8.17	100.0%		100.0%		0.0%	0.0700	0.60	8.17	8.17	0.34	8.2	1.50	0.00	-	-	cleaner
Overall Total													10.21	0.00			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Uncontrolled	16.97	408	74.3	26.06
Controlled	16.97	408	74.3	4.050

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

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Perchloroethylene	Weight % Ethyl Benzene	Weight % Methylene Chloride	Weight % MDI	Weight % Trichloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	MDI Emissions (ton/yr)	Trichloroethylene Emissions (ton/yr)
Surface Coating (PB1)																	
Diamond Vogel Paint, Pt. A VLX14941-01, gallons	11.5	2.060	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diamond Vogel Plural Activator IG-0267, gallons	8.24	0.630	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diamond Vogel Primer, Pt. A VLX15213-04, gallons	12.53	1.090	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diamond Vogel Accelerator, DV 726-025, quarts	6.9	0.002	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Sherwin Williams URE-BLEND Blending Solvent, quarts	7.17	0.002	0.6000	4.000%	10.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.001	0.003	0.000	0.000	0.000	0.000	0.000
Natcon A Resin B Resin ISO	9.275	7.500	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.25%	0.00%	0.000	0.000	0.000	0.000	0.000	0.457	0.000
Natcon IM PEMCO cleaner	8.17	0.070	0.6000	0.000%	0.000%	0.000%	0.000%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
											0.001	0.003	0.000	0.000	0.000	0.457	0.000
Assembly																	
Manus Prod D76AMG Permathane Sealant (drums)	13.7	2.370	0.6000	0.000%	3.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	2.560	0.000	0.000	0.000	0.000	0.000
RS Hughes 3M Tape Primer, gallons	8.24	0.140	0.6000	35.000%	0.000%	0.000%	10.000%	0.000%	0.000%	0.000%	0.881	0.000	0.000	0.252	0.000	0.000	0.000
Manus Prod 73A 10.1 oz Silicone (20% total usage)	8.61	0.540	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
BBC Dist Geocel RP 400, 10 oz	9.02	0.180	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Manus Prod 75AM Prep Caulking, 10.1 oz. tubes tr	8.76	0.060	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
RS Hughes 3m Undercoat 051135-08881, 20 oz. (90% total usage)	9.17	0.140	0.6000	0.000%	20.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.675	0.000	0.000	0.000	0.000	0.000
MW Mobile Seymour MRO Spray Paint 620-1415, 20 oz. (90% total usage)	6.67	0.390	0.6000	4.300%	6.800%	0.000%	0.000%	0.000%	0.000%	0.000%	0.294	0.465	0.000	0.000	0.000	0.000	0.000
Russell Products 690 Spray Adhesive 16 oz., 12 per case (80% total usage)	5.75	0.040	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Sikaflex 252 Sealant, Unipack 20 oz.	10.01	1.980	0.6000	6.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	3.125	0.000	0.000	0.000	0.000	0.000	0.000
SikaFlex 3121, 490 ml cartridge (3785 ml = 1 gal)	8.35	0.030	0.6000	1.750%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.012	0.000	0.000	0.000	0.000	0.000	0.000
SikaFlex 260/205 425050 Primer, 5 gals	6.59	0.390	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LaSalle Sta Put Contact Adhesive SP8027C, 27 lb. canister (3.43 gal/cylinder)	7.86	0.040	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
RW Spray Paints (Bison White, Grey, etc.), 14 oz. (30% total usage)	7.01	0.410	0.6000	15.800%	5.060%	0.000%	2.810%	0.000%	0.000%	0.000%	1.194	0.382	0.000	0.212	0.000	0.000	0.000
RW Allpro Chrome Aluminum 11056 Spray Paint, 20 oz. (90% total usage)	7.01	0.140	0.6000	15.800%	5.060%	0.000%	2.810%	0.000%	0.000%	0.000%	0.408	0.131	0.000	0.072	0.000	0.000	0.000
Alco Cyclo C-34 White Grease, 11 oz. (60% of total usage)	6.68	0.010	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Rollie Williams GPB988 Self Etching Primer, 12 oz. (30% total usage)	6.68	0.009	0.6000	5.000%	2.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.008	0.003	0.000	0.000	0.000	0.000	0.000
											5.920	4.215	0.000	0.536	0.000	0.000	0.000
Assembly (continued)																	
Manus 6104 Permathane Sealant (10.1 oz tubes)	13.70	0.030	0.6000	0.000	0.030	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Manus 5732 10.1 oz Silicone (80% total usage)	8.68	0.860	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
RS Hughes 3m Undercoat 051135-08881, 20 oz. (90% total usage)	9.17	0.140	0.6000	0.000%	20.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.675	0.000	0.000	0.000	0.000	0.000
MW Mobile Seymour MRO Spray Paint 620-1415, 20 oz. (90% total usage)	6.67	0.390	0.6000	4.300%	6.800%	0.000%	0.000%	0.000%	0.000%	0.000%	0.294	0.465	0.000	0.000	0.000	0.000	0.000
Russell Products 690 Spray Adhesive 16 oz., 12 per case (20% total usage)	5.75	0.010	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
RW Spray Paints (Bison White, Grey, etc.), 14 oz. (70% total usage)	7.01	0.060	0.6000	15.800%	5.060%	0.000%	2.810%	0.000%	0.000%	0.000%	0.175	0.056	0.000	0.031	0.000	0.000	0.000
D Carter Oatey Great White Pipe Joint Compound w. PTFE (16 oz.)	16.69	0.001	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
D Carter Tytan Outdoor & RV PRO Expanding Poly Straw Foam Sealant, 32	10	0.230	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	19.000%	0.000%	0.000	0.000	0.000	0.000	0.000	1.148	0.000
RW Allpro Chrome Aluminum 11056 Spray Paint, 20 oz. (10% total usage)	6.19	0.170	0.6000	15.800%	5.060%	0.000%	2.810%	0.000%	0.000%	0.000%	0.437	0.140	0.000	0.078	0.000	0.000	0.000
Alco Cyclo C-34 White Grease, 11 oz. (40% total usage)	6.68	0.007	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Rollie Williams GPB988 Self Etching Primer, 12 oz. (70% total usage)	6.68	0.005	0.6000	5.000%	2.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.004	0.002	0.000	0.000	0.000	0.000	0.000
											0.910	1.337	0.000	0.109	0.000	1.148	0.000
Clean up Solvents																	
MW Mobile MEK	6.72	0.025	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
MW Mobile Isopropyl Alcohol	6.84	0.480	0.6000	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
											0.000	0.000	0.000	0.000	0.000	0.000	0.000
Totals:											6.832	5.556	0.000	0.645	0.000	1.605	0.000

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

TOTAL HAPS 14.638

**Particulate
from Woodworking Operations**

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
 802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Amount of Sawdust Collected lbs/unit	Throughput units/hr	Particulate Potential lbs/hr	Particulate Potential tons/yr
5.00	0.75	3.750	16.43

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

Methodology

PM10 is equal to PM

Particulate Potential (lbs/hr) = Amount of sawdust collected (lbs/unit) x Throughput (units/hr)

Particulate Potential (tons/yr) = Particulate Potential (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000lbs

Welding and Thermal Cutting

Company Name: **Bison Horse Trailers, LLC**
 Address City IN Zip: **804 South Higbee (SR 15), Milford, Indiana 46542**
802 N. Old State Road 15, Milford, Indiana 46542
 MSOP AA: **085-34561-00095**
 Reviewer: **Celeste Wanner**
 Date: **6/2/2014**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)		
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr			
WELDING													
Submerged Arc	0	0	0.036	0.011			0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Metal Inert Gas (MIG)(carbon steel)	15	2	0.0055	0.0005			0.165	1.50E-02	0.00E+00	0.00E+00	0.00E+00	1.50E-02	
Stick (E7018 electrode)	0	0	0.0211	0.0009			0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Tungsten Inert Gas (TIG)(carbon steel)	4	0.1025	0.0055	0.0005			0.002	2.05E-04	0.00E+00	0.00E+00	0.00E+00	2.05E-04	
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Metal Inert Gas (MIG)(ER5154)	4	1.5	0.0241	0.000034		0.00001	0.145	2.04E-04	0.00E+00	6.00E-05		2.64E-04	
FLAME CUTTING													
PROCESS	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS													
Potential Emissions lbs/hr								0.31	0.02	0.00	0.00	0.015	
Potential Emissions lbs/day								7.48	0.37	0.00	0.00	0.37	
Potential Emissions tons/year								1.37	0.07	0.00	0.00	0.068	

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

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

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

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

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

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
802 N. Old State Road 15, Milford, Indiana 46542

MSOP AA: 085-34561-00095

Reviewer: Celeste Wanner

Date: 6/2/2014

includes:	Description	Unit Rating (MMBtu/hr)	Number	Total
	Paint booth air make-up unit	3.89	1	3.89
	Space heaters	0.08	20	1.50
	Power washer	0.44	1	0.44
	Office air make-up unit	0.15	1	0.15
	Radiant space heaters	0.20	8	1.60

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
7.58	1020	65.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx **see below	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.062	0.247	0.247	0.020	3.25	0.18	2.73

*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	6.834E-05	3.905E-05	2.441E-03	5.857E-02	1.106E-04	6.123E-02

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	1.627E-05	3.579E-05	4.556E-05	1.237E-05	6.834E-05	1.783E-04

Total HAPs	6.141E-02
Worst HAP	5.857E-02

Methodology is the same as above.

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

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

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	3,905	0.1	0.1
Summed Potential Emissions in tons/yr	3,905		
CO2e Total in tons/yr	3,929		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
PTE Summary

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Project Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO2e	Total HAPs
Welding	0.63	0.63	0.63	--	--	--	--	--	1.16E-03
Combustion	0.01	0.05	0.05	4.12E-03	0.69	0.04	0.58	829	0.01
Total	0.65	0.69	0.69	4.12E-03	0.69	0.04	0.58	829	0.01

* PM2.5 listed is direct PM2.5

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

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
 802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095

Note these calculations for the new aluminum MIG welders have been added to the Welding tab

Reviewer: Celeste Wanner
Date: 6/2/2014

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)			EMISSIONS (lbs/hr)			HAPS (lbs/hr)
			PM = PM10	Mn	Cr	PM = PM10=PM2.5	Mn	Cr	
WELDING									
Metal Inert Gas (MIG)(carbon steel)	0	0	0.0055	0.0005	0.00001	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(ER5154)	4	1.5	0.0241	0.000034	0.00001	0.145	0.000	0.00006	0.000
EMISSION TOTALS									
Potential Emissions lbs/hr						0.14	0.00	0.00	0.00
Potential Emissions lbs/day						3.47	0.00	0.00	0.01
Potential Emissions tons/year						0.63	0.00	0.00	0.00

Methodology:

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 m

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 m thick)

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

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

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

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

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

Company Name: Bison Horse Trailers, LLC
Address City IN Zip: 804 South Higbee (SR 15), Milford, Indiana 46542
 802 N. Old State Road 15, Milford, Indiana 46542
MSOP AA: 085-34561-00095
Reviewer: Celeste Wanner
Date: 6/2/2014

Units	MMBtu/hr
RS1	0.2
RS2	0.2
RS3	0.2
RS4	0.2
RS5	0.2
RS6	0.2
RS7	0.2
RS8	0.2

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.6	1020	13.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.05	0.05	4.12E-03	0.69	0.04	0.58

*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	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.443E-05	8.245E-06	5.153E-04	1.237E-02	2.336E-05	1.293E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.435E-06	7.558E-06	9.619E-06	2.611E-06	1.443E-05	3.765E-05
						Total HAPs
						1.297E-02
						Worst HAP
						1.237E-02

Methodology is the same as above.

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

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	824	0	0
Summed Potential Emissions in tons/yr	825		
CO2e Total in tons/yr	829		

Methodology

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



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

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

TO: Dan Miller
Bison Horse Trailers, LLC
PO Box 533
Wakarusa, IN 46573

DATE: June 12, 2014

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

SUBJECT: Final Decision
Minor Source Operating Permit (MSOP) Administrative Amendment
085-34561-00095

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:
Rod Lung, General Manager
Kevin Parks, D & B Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 6/12/2014 Bison Horse Trailers LLC 085-34561-00095 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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dan Miller Bison Horse Trailers LLC PO Box 533 Wakarusa IN 46573 (Source CAATS)										
2		Rod Lung General Manager Bison Horse Trailers LLC 804 South Higbee Street Milford IN 46542 (RO CAATS)										
3		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
4		Etna Green Town Council P.O. Box 183, 132 West Broadway Etna Green IN 46524 (Local Official)										
5		Milford Town Council P.O. Box 300, 121 S. Main Street Milford IN 46542 (Local Official)										
6		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
7		Kevin Parks D&B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
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