



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)
for Knapheide Truck Equipment Company in Clark County

FESOP No.: F019-36599-00151

The Indiana Department of Environmental Management (IDEM) has received an application from Knapheide Truck Equipment Company, located at 4701 New Middle Road, Jeffersonville, IN 47130, for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Knapheide Truck Equipment Company to construct and operate a new metal truck parts and truck bed liner surface coating operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit of any regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Jeffersonville Township Public Library
211 East Court Avenue
Jeffersonville, IN 47130
and
IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit



application, please contact IDEM at the address below. Please refer to permit number F019-36599-00151 in all correspondence.

Comments should be sent to:

Madhurima Moulik
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Madhurima Moulik
E-mail: mmoulik@idem.IN.gov

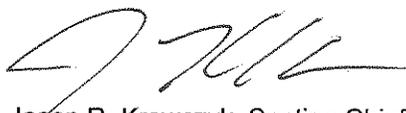
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Madhurima Moulik of my staff at the above address.



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

**New Source Construction and
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY**

**Knapheide Truck Equipment Company
4701 New Middle Road
Jeffersonville, Indiana 47130**

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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

Operation Permit No.: F019-36599-00151	
Issued by:	Issuance Date:
Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal truck parts and truck bed liner surface coating operation.

Source Address:	4701 New Middle Road, Jeffersonville, Indiana 47130
General Source Phone Number:	810-744-0295
SIC Code:	5013 (Motor Vehicle Supplies and New Parts) 3714 (Motor Vehicle Parts and Accessories)
County Location:	Clark
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) surface coating operation for metal truck parts, approved in 2016 for construction, including the following:
 - (1) Preparation including scuffing with handheld sander;
 - (2) One (1) paint booth, identified as PB #1, using a HVLP spray gun, with a maximum usage of 2.66 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S1; and
 - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity 1.5 of MMBtu/hr, exhausting to stack S2.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) surface coating operation for truck bed liners, approved in 2016 for construction, including the following:
 - (1) Preparation including scuffing with handheld sander; and
 - (2) One (1) paint booth, identified as PB #2, using a HVLP spray gun, with a maximum usage of 90.0 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S3.
- (b) One (1) spray gun cleaning operation, using 0.25 gallons per hour of cleaning solvents.

- (c) MIG Welding and oxyacetylene torch cutting operations.
- (d) Miscellaneous natural gas combustion units, including three (3) space heaters and two (2) air make-up units, with a total combined maximum heat input capacity of 6.9 MMBtu/hr.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

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

- (a) This permit, F019-36599-00151, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality,
Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F019-36599-00151 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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 thirty percent (30%) 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.3 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.4 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.5 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.6 Stack Height [326 IAC 1-7]

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual

manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following, where applicable:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) surface coating operation for metal truck parts, approved in 2016 for construction, including the following:
 - (1) Preparation including scuffing with handheld sander;
 - (2) One (1) paint booth, identified as PB #1, using a HVLP spray gun, with a maximum usage of 2.66 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S1; and
 - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity 1.5 of MMBtu/hr, exhausting to stack S2.

Insignificant Activities:

- (a) One (1) surface coating operation for truck bed liners, approved in 2016 for construction, including the following:
 - (1) Preparation including scuffing with handheld sander; and
 - (2) One (1) paint booth, identified as PB #2, using a HVLP spray gun, with a maximum usage of 90.0 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S3.
- (b) One (1) solvent gun cleaning operation, using 0.25 gallons per hour of cleaning solvents.
- (c) MIG Welding and oxyacetylene torch cutting operations.
- (d) Miscellaneous natural gas combustion units, including three (3) space heaters and two (2) air make-up units, with a total combined maximum heat input capacity of 6.9 MMBtu/hr.

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

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

D.1.1 FESOP HAP Limits [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the source shall comply with the following:

- (a) The input of any single HAP and a combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booths PB #1 and PB #2 and gun cleaning operations, shall be less than 9.5 tons and 24.5 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

Compliance with these limitations, combined with the potential to emit from all other emission units at the source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC

2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable and render the source minor under Section 112 of the Clean Air Act.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of four and three-tenths (4.3) pounds of VOC per gallon for clear coatings, three and five-tenths (3.5) pounds of VOC per gallon for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon for extreme performance coatings, and three (3.0) for all other coatings pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at Paint Booth PB #1.
- (b) When using non-compliant coatings, compliance with the VOC content limit above shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

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.

D.1.3 Volatile Organic Compounds (VOC) Work Practices [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), 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 be 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 of 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.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-7]

Pursuant to 326 IAC 8-7-6, upon the startup of PB #1 and PB#2, the Permittee shall submit to the department a certification that the facility is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:

- (1) The name and address of the source and the name and telephone number of the company representative.
- (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
- (3) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).
- (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.

D.1.5 Particulate Matter [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations except Lake County), the Permittee shall comply with the following:

- (a) Pursuant to 326 IAC 6.5 -1-2 (h), the paint booths PB #1 and PB #2 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the scuffing operations at this facility shall not exceed 0.03 grain per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the welding and torch cutting operations shall not exceed 0.03 gr/dscf.
- (d) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the natural gas-fired curing oven and each of the three (3) natural gas-fired space heaters and two (2) air make-up units shall not exceed 0.03 gr/dscf.

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

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the HAP and VOC limitations contained in Conditions D.1.1 and D.1.2 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 and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

Compliance with the VOC content limit in condition D.1.2(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

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.

D.1.9 Particulate Control

- (a) In order to assure compliance with Condition D.1.5, the dry filters shall be in operation and control emissions from the paint booths PB #1 and PB #2 at all times that the associated unit is in operation.
- (b) In the event that filter failure is observed in a multi-compartment filter unit, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.10 Visible Emissions Notations

- (a) Visible emission notations from the paint booth stacks S1 and S3 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.11 Broken or Failed Bag or Filter Detection

- (a) For a single compartment baghouse or filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse or filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been

repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.12 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit and VOC requirements established in Conditions D.1.1 and D.1.4. Records maintained for (4) and (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit in Condition D.1.2.
- (1) The HAP content of each coating material and solvent used less water at PB #1 and PB #2 and solvent gun cleaning operations.
 - (2) The VOC content of each coating material used less water at PB #1 and PB #2.
 - (3) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (4) The amount of each coating material used on a daily basis at PB #1.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (5) The volume weighted average VOC content of the coatings used at PB #1 for each day.
- (b) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

D.1.13 Reporting Requirement

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) One (1) solvent gun cleaning operation, using 0.25 gallons per hour of cleaning solvents.

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

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

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met:

- (1) Equip the degreaser with a cover.
- (2) Equip the degreaser with a device for draining cleaned parts.
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (1) The name and address of the solvent supplier.

- (2) The date of purchase.
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Knapheide Truck Equipment Company
Source Address: 4701 New Middle Road, Jeffersonville, Indiana 47130
FESOP Permit No.: F019-36599-00151

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Knapheide Truck Equipment Company
Source Address: 4701 New Middle Road, Jeffersonville, Indiana 47130
FESOP Permit No.: F019-36599-00151

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Knapheide Truck Equipment Company
Source Address: 4701 New Middle Road, Jeffersonville, Indiana 47130
FESOP Permit No.: F019-36599-00151
Facility: Spray Booths PB #1 and PB #2, including coatings, dilution and cleaning solvents, and solvents used in gun cleaning operations
Parameter: Single HAP and total HAPs
Limit: 9.5 tons and 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Source Name: Knapheide Truck Equipment Company
 Source Address: 4701 New Middle Road, Jeffersonville, Indiana 47130
 FESOP Permit No.: F019-36599-00151

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Knapheide Truck Equipment Company
4701 New Middle Road
Jeffersonville, Indiana 47130

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Knapheide Truck Equipment Company 4701 New Middle Road, Jeffersonville, Indiana 47130, completed construction of the metal truck parts and truck bed liner surface coating operation on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 11, 2015 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F019-36599-00151, Plant ID No. 019-00151 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

**Technical Support Document (TSD) for a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)**

Source Description and Location

Source Name:	Knapheide Truck Equipment Company
Source Location:	4701 New Middle Road, Jeffersonville, IN 47130
County:	Clark
SIC Code:	5013 (Motor Vehicle Supplies and New Parts) 3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	F019-36599-00151
Permit Reviewer:	Madhurima Moulik

On December 11, 2015, the Office of Air Quality (OAQ) received an application from Knapheide Truck Equipment Company related to the construction and operation of a new metal truck parts and truck bed liner surface coating operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Clark 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}	Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clark 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}**
Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5}

emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.

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

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Knapheide Truck Equipment Company on December 11, 2015, relating to the construction and operation of a new metal truck part and truck bed liner surface coating operation.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) surface coating operation for metal truck parts, approved in 2016 for construction, including the following:
- (1) Preparation including scuffing with handheld sander;
 - (2) One (1) paint booth, identified as PB #1, using a HVLP spray gun, with a maximum usage of 2.66 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S1; and
 - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity 1.5 of MMBtu/hr, exhausting to stack S2.
- (b) One (1) surface coating operation for truck bed liners, approved in 2016 for construction, including the following:
- (1) Preparation including scuffing with handheld sander; and
 - (2) One (1) paint booth, identified as PB #2, using a HVLP spray gun, with a maximum usage of 90.0 gallons of paint per hour, using dry filters as particulate control, and exhausting to stack S3.
- (c) One (1) spray gun cleaning operation, using 0.25 gallons per hour of cleaning solvents.
- (d) MIG Welding and oxyacetylene torch cutting operations.
- (e) Miscellaneous natural gas combustion units, including three (3) space heaters and two (2) air make-up units, with a total combined maximum heat input capacity of 6.9 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	13.44
PM10 ⁽¹⁾	13.65
PM2.5 ⁽¹⁾	13.65
SO ₂	0.02
NO _x	3.68
VOC	66.13
CO	3.09

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Ethyl Benzene	7.37
Methyl Isobutyl Ketone	8.26
Toluene	4.38
Xylene	29.88
MDI	0.004
TOTAL HAPs	47.90

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The PTE of all regulated criteria pollutants are less than one hundred (100) tons per year.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7.

However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth PB #1	5.85	5.85	5.85	--	--	58.85	--	<24.5	<9.5
Paint Booth PB #2	0.10	0.10	0.10	--	--	0.003	--		
Scuffing Operations	6.63	6.63	6.63	--	--	--	--		
Spray Gun Cleaning	--	--	--	--	--	7.17	--		
Natural Gas Combustion	0.07	0.28	0.28	0.02	3.68	0.20	3.09	0.07	Negl.
Welding and Torch Cutting	0.79	0.79	0.79	--	--	--	--	Negl.	Negl.
Total PTE of Entire Source	13.44	13.65	13.65	0.02	3.68	66.13	3.09	<25	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	-	-	-	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	-	-	100	100	100	-	-	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".									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG

emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) FESOP Status

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the source shall comply with the following:

- (1) The input of any single HAP and a combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booths PB #1 and PB #2 and spray gun cleaning operations, shall be less than 9.5 tons and 24.5 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

Compliance with these limitations, combined with the potential to emit from all other emission units at the source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable and shall render the source an area source under Section 112 of the Clean Air Act.

(b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
- (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(c) Emission Offset Minor Source

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit PM_{2.5}, SO₂ and NO_x are less than 100 tons per year, each. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operation, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this truck part and truck bed liner surface coating facility is not an assembly plant.
- (b) The requirements of the New Source Performance Standard for New Residential Hydronic Heaters and Forced-Air Furnaces, 40 CFR 60, Subpart QQQQ (326 IAC 12), are not included in the permit, since the natural gas-fired space heaters at this facility do not meet the definition of residential hydronic heater, forced-air furnace, or central heater as defined under 60 CFR 60.5473.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart M (326 IAC 20-80), are not included in the permit, since the Permittee has accepted a facility-wide limit on emissions of HAPS to qualify as an area source for HAPS, and therefore pursuant to 40 CFR 63.3881(b), the source is not subject to this NESHAP.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since the Permittee has accepted a facility-wide limit on emissions of HAPS to qualify as an area source for HAPS, and therefore pursuant to 40 CFR 63.3081(b), the source is not subject to this NESHAP.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20), are not included in the permit, since the spray gun cleaning operation at this facility does not use any halogenated solvent as listed under 40 CFR 63.460(a).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20) are not included in the permit. This source does not perform paint stripping operations using MeCl, or perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180. Pursuant to 40 CFR 63.11170(a)(2), this NESHAP is applicable to spray application of coatings, as defined in 40 CFR 63.11180, to motor vehicles and mobile equipment. Under 40 CFR 63.11180, this is defined as follows:

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

This source does not perform surface coating of assembled motor vehicles or mobile equipment, and the surface coating performed at this facility does not meet the above definition; therefore, the surface coating operations at this source are not subject to 40 CFR 63, Subpart HHHHHHHH.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-8-4 (FESOP)

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

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

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

326 IAC 2-3 (Emission Offset)

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

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

The unlimited potential to emit of HAPs from the new units is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the entire source to 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. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

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.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

The source is not subject to the requirements of 326 IAC 6-5, because vehicular traffic on paved roads has potential fugitive particulate emissions less than 25 tons per year.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

326 IAC 8-3-2 (VOC: Cold Cleaner Degreaser)

The spray gun cleaning operation at this source is a cold cleaner degreaser as defined in 326 IAC 1-2-18.5, and is subject to the requirements of 326 IAC 8-3-2.

326 IAC 8-3-2(a) requires the owner or operator to:

Ensure the following control equipment and operating requirements are met:

- (1) Equip the degreaser with a cover.
- (2) Equip the degreaser with a device for draining cleaned parts.
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

326 IAC 8-3-8 (VOC: Material Requirements for Cold Cleaner Degreasers)

The spray gun cleaner at this facility is a cold cleaner degreaser located in Clark County, using a VOC - containing solvent, and is scheduled to be constructed after July 1, 1990. Therefore, 326 IAC 8-3-8 applies.

326 IAC 8-3-8(b) requires:

- (1) No person shall cause or allow the sale of solvents for use in cold cleaning degreasing operations with a VOC composite partial vapor pressure, when diluted at the manufacturer's recommended blend and dilution, that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit) in an amount greater than five (5) gallons during any seven (7) consecutive days to an individual or business.
- (2) No person shall operate a cold cleaning degreaser with a solvent that has a VOC partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

The following record keeping requirements shall be followed:

- (1) All persons subject to the requirements of subsection (b)(1) shall maintain all of the following records for each sale:
 - (a) The name and address of the solvent purchaser.
 - (b) The date of sale.
 - (c) The type of solvent sold.
 - (d) The volume of each unit of solvent sold.
 - (e) The total volume of the solvent sold.
 - (f) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (2) All persons subject to the requirements of subsection (b)(2) shall maintain each of the following records for each purchase:
 - (a) The name and address of the solvent supplier.
 - (b) The date of purchase.
 - (c) The type of solvent purchased.
 - (d) The total volume of the solvent purchased.
 - (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20)

degrees Celsius (sixty-eight (68) degrees Fahrenheit).

All records required above (by 326 IAC 8-3-8(c)) shall be:

- (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
- (2) shall be reasonably accessible for an additional two (2) year period.

Paint Booth PB #1

326 IAC 6.5 (Particulate Matter Limitations except Lake County)

This source is located in Clark County and the source-wide particulate matter PTE is not limited to less than 10 tons per year. The emission units at this source that have PM emissions are not subject to more stringent limitations under 326 IAC 12. Therefore, 326 IAC 6.5 is applicable to emission units that have the potential to emit of PM.

The Permittee shall comply with the following:

- (a) Pursuant to 326 IAC 6.5-1-2(h), the paint booth PB #1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-3-1(b)(2), emissions units subject to as stringent or more stringent operations under 326 IAC 6.5 are not subject to the PM emission limitations under 326 IAC 6-3-2. The paint booth PB #1 is subject to as stringent limitation under 326 IAC 6.5. Therefore, 326 IAC 6-3-2 does not apply to PB #1.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The unlimited VOC potential emissions from the paint booth PB #1 are greater than twenty-five (25) tons per year. However, the PB #1 is subject to requirements under 326 IAC 8-2-9 and IAC 8-7. Therefore, pursuant to 326 IAC 8-1-6(3)(A), the requirements of 326 IAC 8-1-6 do not apply.

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

The surface coating operations at this facility, located in Clark County, are not subject to 326 IAC 8-2-2 because this source is not an automotive or light duty truck assembly plant, and is therefore not subject to the limitations under 326 IAC 8-2-2(b).

326 IAC 8-2-9 (VOC: Miscellaneous Metal and Plastic Parts Coating Operations)

This source, which has surface coating booths for metal truck parts and truck bed liners, is not located in Lake or Porter County and has SIC code of 5013. However, this source performs metal surface coating operations under the industrial category 3714 (Motor Vehicle Parts and Accessories). Therefore, it meets the applicability criteria listed under 326 IAC 8-2-9(a)(1)(E).

The surface coating booth PB #1 has actual VOC emissions of greater than 15 pounds per day (uncontrolled), and therefore pursuant to 326 IAC 8-2-1(a)(4), is subject to the requirements of 326 IAC 8-2-9.

- (a) For PB #1, pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of: four and three-tenths (4.3) pounds of VOC per gallon for clear coatings, three and five-tenths (3.5) pounds of VOC per gallon for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon for extreme performance coatings, and three (3.0) for all other coatings pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

- (b) When using non-compliant coatings, compliance with the VOC content limit above shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

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.

- (c) Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), 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 be limited to, the following:

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

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The surface coating booth PB #1, located in Clark County, has potential to emit of VOCs greater than ten (10) tons per year. Therefore, pursuant to 326 IAC 8-7-2(a), the requirements under 326 IAC 8-7 are applicable to PB #1.

Pursuant to 326 IAC 8-7-2(c), facilities with aggregate potential to emit of VOCs greater than 40 tons per year but less than 100 tons per year, located in Clark County, shall comply with the certification, recordkeeping, and reporting requirements of 326 IAC 8-7-6.

Pursuant to 326 IAC 8-7-6, upon the startup of PB #1, the Permittee shall submit to the department a certification that the facility is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:

- (1) The name and address of the source and the name and telephone number of the company representative.
- (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
- (3) A listing of facilities which meet the requirements of section 2(a) of this rule (326 IAC 8-7-2(a)).

- (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
- (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.

326 IAC 8-10 (Automobile Refinishing)

The surface coating and associated operations at PB #1, located in Clark County, are not subject to the requirements of 326 IAC 8-10, because this source does not perform automobile refinishing as defined in 326 IAC 8-10-2(5), which defines "Automobile Refinishing as:

"refinishing operations for after-market motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment performed in:

- (A) auto body and repair shops;
- (B) production paint shops;
- (C) new car dealer repair and paint shops;
- (D) fleet operation repair and paint shops; and
- (E) any other facility that coats vehicles under the Standard Industrial Classification (SIC) code 7532 (top, body, and upholstery repair shops and paint shops)".

This facility does not perform refinishing operations on after-market motor vehicles or motor vehicle parts, and therefore is not subject to the requirements of this rule.

326 IAC 8-17 (Industrial Solvent Cleaning Operations)

The solvent cleaning operation at this source is not subject to the requirements of 326 IAC 8-17, because this source is not located in Lake or Porter County.

Curing Oven

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the natural gas-fired curing oven shall be limited to 0.03 grain per dry standard cubic feet.

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 lbs/hour are exempt from the PM emissions limitations under 326 IAC 6-3-2. Therefore, the curing oven is not subject to the requirements under 326 IAC 6-3-2.

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

326 IAC 6-2 does not apply to direct-fired emission units, such as curing ovens, where there is contact between the combustion gases and material being heated. Therefore, the curing oven is not subject to the requirements of 326 IAC 6-2.

Paint Booth PB #2

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source is located in Clark County and the source-wide particulate matter PTE is not limited to less than 10 tons per year. The emission units at this source that have PM emissions are not subject to more stringent limitations under 326 IAC 12. Therefore, 326 IAC 6.5 is applicable to emission units that have the potential to emit of PM.

The Permittee shall comply with the following:

- (a) Pursuant to 326 IAC 6.5-1-2(h), the paint booth PB #2 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-3-1(b)(2), emissions units subject to as stringent or more stringent operations under 326 IAC 6.5 are not subject to the PM emission limitations under 326 IAC 6-3-2. The paint booth PB #2 is subject to as stringent limitation under 326 IAC 6.5. Therefore, 326 IAC 6-3-2 does not apply to PB #2.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The potential VOC emissions from paint booth PB #2 are less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply.

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

The surface coating operations at this facility are not subject to 326 IAC 8-2-2 because this source is not an automotive or light duty truck assembly plant.

326 IAC 8-2-9 (VOC: Miscellaneous Metal and Plastic Parts Coating Operations)

The surface coating booth PB #2 has actual VOC emissions of less than 15 pounds per day before add-on controls, and therefore, pursuant to 326 IAC 8-2-1(a)(4), is not subject to the requirements of 326 IAC 8-2-9.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The surface coating booth PB #1 at this source, located in Clark County, has potential to emit of VOCs greater than ten (10) tons per year. Therefore, pursuant to 326 IAC 8-7-2(a), the requirements under 326 IAC 8-7 are applicable to this source. Therefore, 326 IAC 8-7 is applicable to PB #2.

Pursuant to 326 IAC 8-7-2(c), facilities with aggregate potential to emit of VOCs greater than 40 tons per year but less than 100 tons per year, located in Clark County, shall comply with the certification, recordkeeping, and reporting requirements of 326 IAC 8-7-6.

Pursuant to 326 IAC 8-7-6, upon the startup of PB #2, the Permittee shall submit to the department a certification that the facility is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:

- (1) The name and address of the source and the name and telephone number of the company representative.
- (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
- (3) A listing of facilities which meet the requirements of section 2(a) of this rule (326 IAC 8-7-2(a)).
- (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.

326 IAC 8-10 (Automobile Refinishing)

The surface coating and associated operations at PB #2, located in Clark County, are not subject to the requirements of 326 IAC 8-10, because this source does not perform automobile refinishing as defined in 326 IAC 8-10-2(5), which defines "Automobile Refinishing as:

"refinishing operations for after-market motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment performed in:

- (A) auto body and repair shops;

- (B) production paint shops;
- (C) new car dealer repair and paint shops;
- (D) fleet operation repair and paint shops; and
- (E) any other facility that coats vehicles under the Standard Industrial Classification (SIC) code 7532 (top, body, and upholstery repair shops and paint shops)".

This facility does not perform refinishing operations on after-market motor vehicles or motor vehicle parts, and therefore is not subject to the requirements of this rule.

Scuffing Operation using Sanders

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The source, located in Clark County, has actual emissions of greater than 10 tons per year. Therefore, pursuant to 326 IAC 6.5-1-1(a)(2)(B), the requirements of 326 IAC 6.5 are applicable. Pursuant to 326 IAC 6.5-1-2, particulate matter emissions from the scuffing operations at this facility shall not exceed 0.03 grain per dry standard cubic foot (dscf).

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

Pursuant to 326 IAC 6-3-1(b)(2), emissions units subject to as stringent or more stringent operations under 326 IAC 6.5 are not subject to the PM emission limitations under 326 IAC 6-3-2. The scuffing operation is subject to a more stringent limitation under 326 IAC 6.5. Therefore, 326 IAC 6-3-2 does not apply.

Welding and Torch Cutting

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the welding and torch cutting operations shall not exceed 0.03 gr/dscf.

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 lbs/hour are exempt from the PM emissions limitations under 326 IAC 6-3-2.

Natural Gas Combustion (Space Heaters, Air Make-Up Units)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from each of the three (3) natural gas-fired space heaters and two (2) natural gas-fired air make-up units at this source shall be limited to 0.03 grain per dry standard cubic feet.

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

326 IAC 6-3 applies only to activities that are used to produce intermediate or final products. Therefore, space heaters and air make-up units are not subject to 326 IAC 6-3.

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

326 IAC 6-2 does not apply to direct-fired emission units, such as space heaters and air make-up units, where there is contact between the combustion gases and material being heated. Therefore, the space heaters and air make-up units are not subject to the requirements of 326 IAC 6-2.

Compliance Determination, Monitoring and Testing Requirements

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

1. The dry filters shall be in operation and control emissions from the paint booths PB #1 and PB #2 at all times that the associated unit is in operation.

2. In the event that filter failure is observed in a multi-compartment filter unit, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
3. Visible Emissions Notations
 - (a) Visible emission notations from the paint booth stacks S1 and S3 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
4. For a single compartment baghouse or filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
5. For a single compartment baghouse or filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

There are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 11, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F019-36599-00151. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (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

Source Name: Knapheide Truck Equipment Company
Source Address: 4701 New Middle Road, Jeffersonville, IN 47130
Permit No.: NSC and FESOP F019-36599-00151
Permit Reviewer: Madhurima Moulik

Pollutant	Maximum Uncontrolled Emissions (Tons/Yr)							Limited Emissions (tons/yr) (Sourcewide)*
	Paint Booth #1	Paint Booth #2	Scuffing	Cleaning	Welding + Torch Cutting	Combustion	Total	
PM	5.85	0.10	6.63	---	0.79	0.07	13.44	13.44
PM10	5.85	0.10	6.63	---	0.79	0.28	13.65	13.65
PM2.5	5.85	0.10	6.63	---	0.79	0.28	13.65	13.65
VOC	58.75	0.004	---	7.17	---	0.20	66.13	66.13
NOx	---	---	---	---	---	3.68	3.68	3.68
SO2	---	---	---	---	---	0.02	0.02	0.02
CO	---	---	---	---	---	3.09	3.09	3.09
Single HAP (Ethyl Benzene)	7.37	---	---	---	---	---	7.37	7.37
Single HAP (MIBK)	8.26	---	---	---	---	---	8.26	8.26
Single HAP (Toluene)	2.23	---	---	2.15	---	0.0001	4.38	4.38
Single HAP (Xylene)	29.88	---	---	---	---	---	29.88	<10
Single HAP (MDI)	---	0.004	---	---	---	---	0.004	0.004
Combined HAPs	45.60	0.004	---	2.22	0.003	0.07	47.90	<25

*The input of any single HAP and a combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booths PB #1 and PB #2 and spray gun cleaning operations, shall be less than 9.50 tons and 24.50 tons per twelve (12) consecutive month period, respectively

Appendix A: Emission Calculations

Source Name: Knapheide Truck Equipment Company
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VOC and Particulate Emissions (As-Applied Coating Formulations)

Material	Substrate	Density (lbs/gal)	Weight % Organics	Weight % Water	Maximum Spray Rate (gal/hr)	Pounds VOC per Gallon of Coating (As Applied)	Potential Emissions				Transfer Efficiency
							VOC (lbs/hr)	VOC (lbs/day)	VOC (tons/yr)	PMPM10 (tons/yr)	
Corlar 825P32760 Primer mixed with Corlar FGP32767 Activator	metal	11.33	29.60%	0.00%	2.66	3.35	8.92	214.10	39.07	5.30	75.00%
Chromapremier Basecoat 817F White mixed with 7175S Basemaker and 12305S Activator	metal	8.03	62.80%	0.00%	2.66	5.04	13.41	321.93	58.75	1.99	75.00%
Excel Pro Topcoat 15P85002EZ mixed with 15307S Activator	metal	8.96	34.60%	0.00%	2.66	3.10	8.25	197.91	36.12	3.90	75.00%
Chroma Mosaic Basecoat 99B Black mixed with SBL6627S Adjustment Binder and 12375S Reducer	metal	9.64	8.80%	0.10%	2.66	0.85	2.26	54.16	9.88	5.85	75.00%
Chromapremier 72500S Clearcoat mixed with 12305S Activator and 12375S Reducer	metal	8.18	42.10%	0.00%	2.66	3.44	9.16	219.85	40.12	3.15	75.00%
							Worst Case PTE (tpy)	58.75	5.85		
							Control Efficiency	-	99.40%		
							Controlled Emissions (tpy)	58.75	0.04		

HAP Emissions (Individual Coatings)

Material	Density (lbs/gal)	Maximum Spray Rate (gal/hr)	HAP Components (Weight %)							HAP Potential Emissions (tons/yr)							
			N-Butyl Alcohol	Cumene	Ethyl Benzene	Methyl Isobutyl Ketone	Naphthalene	Toluene	Xylene	N-Butyl Alcohol	Cumene	Ethyl Benzene	Methyl Isobutyl Ketone	Naphthalene	Toluene	Xylene	Total Combined HAPs
Corlar 825P32760 Primer	12.28	2.66	2.00%	0.00%	0.40%	0.00%	0.30%	0.00%	2.00%	2.86	0.00	0.57	0.00	0.43	0.00	2.86	6.72
Corlar FGP32767 Activator	7.82	2.66	0.00%	0.40%	0.00%	0.00%	1.30%	0.00%	0.00%	0.00	0.36	0.00	0.00	1.18	0.00	0.00	1.55
Subtotals:										2.86	0.36	0.57	0.00	1.61	0.00	2.86	8.27
Chromapremier Basecoat 817F White	9.11	2.66	0.00%	0.00%	4.20%	0.00%	0.10%	17.00%	0.00	0.00	0.00	4.46	0.00	0.11	18.04	22.61	
Chromapremier 7175S Basemaker	9.11	2.66	0.00%	0.00%	2.40%	5.50%	0.00%	2.00%	10.00%	0.00	0.00	2.55	5.84	0.00	2.12	10.61	21.12
Chromapremier 12305S Activator	8.51	2.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotals:										0.00	0.00	7.01	5.84	0.00	2.23	28.66	43.73
Excel Pro Topcoat 15P85002EZ	10.09	2.66	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.12
15307S Activator	8.79	2.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotals:										0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.12
Chroma Mosaic Basecoat 99B Black	7.76	2.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SBL6627S Adjustment Binder	10.3	2.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
12375S Reducer	7.09	2.66	0.00%	0.00%	5.00%	10.00%	0.00%	0.10%	20.00%	0.00	0.00	4.13	8.26	0.00	0.08	16.52	28.99
Subtotals:										0.00	0.00	4.13	8.26	0.00	0.08	16.52	28.99
Chromapremier 72500S	8.19	2.66	0.00%	0.00%	3.40%	0.00%	0.00%	0.00%	14.00%	0.00	0.00	3.24	0.00	0.00	0.00	13.36	16.60
12305S Activator	8.51	2.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
12375S Reducer	7.09	2.66	0.00%	0.00%	5.00%	10.00%	0.00%	0.10%	20.00%	0.00	0.00	4.13	8.26	0.00	0.08	16.52	28.99
Subtotals:										0.00	0.00	7.37	8.26	0.00	0.08	29.88	45.60
										Worst Case Single HAP PTE (tpy)		29.88					
										Worst Case Combined HAPs PTE (tpy)		45.60					

NOTES:

Paint Booth #1 will be used to spray coating onto metal truck parts and metal truck body parts. The parts will arrive at the facility coated with a primer. The primed coat will be scuffed with a hand-held sander to promote adhesive to the top or base coat. If too much primer is removed, a new primer coating will need to be sprayed back onto the part. The part will then be painted with a top or base coat and then sent to a natural gas-fired drying oven. The PM emissions from the scuffing process are identified in a separate emission spreadsheet. The coating materials identified are the best representative materials expected to be used. This paint booth will utilize one HVLP spray gun with a transfer efficiency of 75%. Since there is only one spray gun, only one coating or primer material can be sprayed at any given time. The coating material chemical components and properties are identified from the SDSs and TDSs provided by the coating manufacturers. The maximum spray rate of the gun is provided by the facility and represents the maximum amount of coating that can be applied with this gun at full throttle based upon measurements at another Knapheide facility using the same spray technology. The spray booth is totally enclosed to ensure 100% capture efficiency during spraying. The booth is equipped with polyester filters to capture paint overspray. The filters have a 99.4% control efficiency. There are no VOC emission control devices. The maximum potential VOC and PM emissions are based on the worst-case coating or primer product being sprayed 100% of the time since there is only one spray gun. These emissions are based on the as-applied product formulations (which can contain top or base coat, basemaker, and activator). The maximum potential HAP emissions are based on the worst-case individual components identified in each primer or coating formulation. It is assumed that 100% of the VOC and volatile HAP would be released as an air emission.

METHODOLOGY:

Weight % Organics value is provided by coating manufacturer and represents the total weight % volatiles - weight % exempt solvents.
 Pounds VOC per Gallon of Coating (As Applied) is the as applied final VOC content minus exempt materials
 Pounds of VOC per Gallon Coating (As Applied) = Density (lbs/gal) * Weight % Organics
 Potential VOC Emissions (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Maximum Spray Rate (gal/hr)
 Potential VOC Emissions (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Maximum Spray Rate (gal/hr) * (24 hr/day)
 Potential VOC Emissions (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Maximum Spray Rate (gal/hr) * (8,760 hr/yr) * (1 ton/2,000 lbs)
 Potential PMPM10 Emissions before Control (lbs/hr) = Maximum Spray Rate (gal/hr) * Density (lbs/gal) * (1 - Weight % Organics) * (1-transfer efficiency %)
 Controlled potential PMPM10 Emissions (tons/yr) = Potential PMPM10 Emissions Before Control (tons/yr) * (1 - control efficiency %)
 Potential HAP Emissions (tons/yr) = Density (lbs/gal) * Maximum Spray Rate (gal/hr) * Weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lbs)

Appendix A: Emission Calculations

Source Name: Knapheide Truck Equipment Company
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Permit No.: NSC and FESOP F019-36599-00151
Permit Reviewer: Madhurima Moulik

VOC and Particulate Emissions (As-Applied Coating Formulation)

Material	Substrate	Density (lbs/gal)	Weight % Solids*	Weight % Water	Maximum Spray Rate (gal/hr)	Potential Emissions				Transfer Efficiency
						VOC/HAP (MDI) (lbs/yr)	VOC/HAP (MDI) (lbs/day)	VOC/HAP (MDI) (tons/yr)	PM/PM10 (tons/yr)	
"Green" Gator 90A Polyurea Spray Coating (Components A and B)	metal	9.31	100.00%	0.00%	90.00	8.77	0.02	0.004	0.105	75.00%
						Worst Case PTE (tpy)		0.004	0.105	
						Control Efficiency		-	99.40%	
						Controlled Emissions (tpy)		0.004	0.00063	

*Component B of this coating has 100% solids. Worst case is assumed for PM emissions calculations

NOTES:

Paint Booth #2 will be used to spray coating onto metal truck bedliners. The parts arrive at the facility coated with a primer. The primed coat is scuffed with a hand-held sander to promote adhesive to the polyurea coating. Note that no touch-up primer is sprayed in this booth after the scuffing process.

The coating material identified is the best representative material expected to be used.

The Part A Component contains 18-22% MDI, which is considered a VOC and HAP. The Part B Component does not contain any MDI and therefore no VOC and HAP emissions.

This paint booth will utilize one high pressure, plural component pump with a transfer efficiency of 75%.

The coating material chemical components and properties are identified from the SDSs and TDS provided by the coating manufacturer.

The maximum spray rate of the booth is provided by the facility and is based on the two components mixed at a volume ratio of 1:1.

The spray booth is totally enclosed to ensure 100% capture efficiency during spraying. The booth is equipped with polyester filters to capture paint overspray. The filters have a 99.4% control efficiency. There are no VOC emission control devices.

The maximum potential VOC emissions are based on the emissions data from the American Chemistry Council (MDI Emissions Reporting Guidelines for the Polyurethanes Industry) which is identified in a separate emission spreadsheet.

It is assumed that 100% of the VOC and volatile HAP would be released as an air emission.

METHODOLOGY:

Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/yr from ACC data) * (1 ton/2,000 lbs)

Potential PM/PM10 Emissions before Control (lbs/hr) = Maximum Spray Rate (gal/hr) * Density (lbs/gal) * (Weight % Organics) * (1-transfer efficiency %) * (1ton/2,000 lbs)

Controlled potential PM/PM10 Emissions (tons/yr) = Potential PM/PM10 Emissions Before Control (tons/yr) * (1 - control efficiency %)

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MDI Emissions from Spray Coating of Two Part Polyurea Spray System:

$$L_{sp} = (V_{air}/359) \times (273.15/T_{sp}) \times 60 \times (C_{mdi}/1000000) \times M_w \times K_{MDI} \times t_{sp}$$

Where:

L_{sp} = the emissions in lbs/yr for spray coating operations

V_{air} = the exhaust air flow rate in ft³/min

T_{sp} = the spray temperature in K

C_{mdi} = the MDI concentration in ppmv, in the exhaust air

M_w = the molecular weight of MDI (250.26)

K_{MDI} = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature

t_{sp} = the total time in hours/yr that spray coating will occur

359 = the molar volume of an ideal gas in ft³/lb-mole at 0° C and 1-atmosphere

$$C_{mdi} = (VP_{MDI}/760) \times 10^6$$

VP_{MDI} = MDI vapor pressure at exhaust temperature (based on the MDI Vapor Pressure Chart in Table A-1 in the MDI Emissions Reporting Guidelines)

NOTE: We do not need to use this calculation since we already have an actual measurement of MDI concentration.

Estimated Worst-Case Values:

$$V_{air} = 16,800 \text{ ft}^3/\text{min}$$

$$T_{sp} = 347.04^{\circ} \text{K (equal to } 165^{\circ} \text{F)}$$

$$C_{mdi} = 0.0049 \text{ ppmv (IAQ Test Summary provided by the facility)}$$

$$M_w = 250.26$$

$$K_{MDI} = 0.38 \text{ (note only the Part A component contains Diphenylmethane Diisocyanate - MDI; the MSDS identifies this to be 18 to 22\%)}$$

$$t_{sp} = 5,475 \text{ hrs/yr}$$

$$\text{MDI Emissions (lbs/yr)} = (16,800 \text{ ft}^3/\text{min} / 359) \times (273.15/357.04^{\circ}\text{K}) \times 60 \times (0.0049 \text{ ppmv}/1000000) \times 250.26 \times 0.38 \times 8760 \text{ hrs/yr} =$$

8.77 lbs/yr

NOTES:

VP_{MDI} and K_{MDI} are based upon factors provided in the document titled "MDI Emissions Reporting Guidelines for the Polyurethanes Industry", May 2012 AX186, American Chemistry Council - Center for the Polyurethanes Industry

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Paint Booth #1:

PM Emissions from Scuffing Process = PM Emissions from spraying the primer coating in PB #1 (tons/yr): 5.30

Paint Booth #2:

PM Emissions from Scuffing Process = 1/4 the PM emissions from the scuffing process in PB #1 (tons/yr): 1.33

Total:

6.63

NOTES:

The metal truck parts that are received at the facility already come with a primer coating. This primed coat will be scuffed with a hand-held sander to promote better adhesion for the top or base coat in Paint Booth #1. If too much primer is removed, a new primer coating will need to be sprayed back onto the part. The part will then be painted with a top or base coat and then sent to a natural gas-fired drying oven.

Since the primer is only sprayed when too much primer is removed from the truck part, the amount of primer removed is approximately equal to the amount of new primer to be sprayed. The PM emissions from the scuffing process in PB #1 are conservatively assumed to be equal to the PM emissions from spraying the primer as identified in a separate emission spreadsheet.

This methodology cannot be used for Paint Booth #2 since new primer is not spray applied to the truck bedliners in this paint booth after the scuffing process. The PM emissions from the scuffing process in PB #2 are conservatively assumed to be equal to 25% of the PM emissions from the scuffing process in PB #1.

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VOC and HAP Emissions (Individual Cleaning Solvent)

Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Organics	HAP Components (Weight %)		HAP Potential Emissions (tons/yr)			VOC Emissions (tons/yr)
				Methanol	Toluene	Methanol	Toluene	Total Combined HAPs	
Knapheide Gun Wash II	6.55	0.25	100.00%	1.00%	30.00%	0.07	2.15	2.22	7.17

Worst Case Single HAP PTE (tpy)	2.15	Toluene
Worst Case Combined HAPs PTE (tpy)	2.22	

NOTES:

Cleaning solvent will be used to clean the spray guns in each booth after the coating mixtures are sprayed.

The cleaning solvent identified is the best representative material expected to be used.

The cleaning solvent chemical components and properties are identified from the SDS provided by the solvent manufacturer.

The maximum usage of the solvent is provided by the facility and represents the maximum amount of solvent anticipated to be used at the maximum spray application rates for each booth.

It is assumed that 100% of the VOC and volatile HAP would be released as an air emission.

METHODOLOGY:

Potential VOC Emissions (tons/yr) = Density (lbs/gal) * Maximum Usage (gal/hr) * Weight % Organics * (8,760 hr/yr) * (1 ton/2,000 lbs)

Potential HAP Emissions (tons/yr) = Density (lbs/gal) * Maximum Usage (gal/hr) * Weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lbs)

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Emission Unit Description	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
Curing Oven	1.500	13.1
Space Heater #1	0.120	1.1
Space Heater #2	0.060	0.5
Space heater #3	0.125	1.1
AMU in Shipping Dpt.	3.300	28.9
AMU in Main Bldg.	3.300	28.9
	8.4	73.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx**	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.07	0.28	0.02	3.68	0.20	3.09

*PM emission factor is filterable PM only. PM10/PM2.5 emission factor is filterable and condensable particulate matter 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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

(SUPPLEMENT D 3/98)

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

HAPs - Organics						Total HAPS
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMCF	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	7.73E-05	4.42E-05	2.76E-03	0.07	1.25E-04	
HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMCF	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	1.84E-05	4.05E-05	5.15E-05	1.40E-05	7.73E-05	0.07

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

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

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Permit No.: NSC and FESOP F019-36599-00151
Permit Reviewer: Madhurima Moulik

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS (lb pollutant/lb electrode)				Potential to Emit (tons/year)				
				PM=PM10=PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel) - Maintenance	3	0.04		0.0241	0.000034	NA	0.00001	0.013	0.00002	0	0.00001	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				
				PM=PM10=PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Oxyacetylene Torch	2	8.0	5.0	0.1622	0.0005	0.0001	0.0003	0.779	0.002	0.000	0.001	
Totals								0.79	0.002	0.000	0.001	

Notes:

MIG welding emission factors are from AP 42, Chapter 12-19, Tables 12-19.1 and 12-19.2 (SCC 3-09-052-26) January 1995.

Methodology:

PTE (tons/year) = Number of Stations x Electrode Consumption (lbs/hour) x Emission Factor (lbs /lb electrode) x 8760 (hours/year) x 1 ton/2,000 lbs

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

**Company Name: Knapheide Truck Equipment Company
Source Address: 4701 New Middle Road, Jeffersonville, IN 47130
Permit Number: NSC and FESOP F019-36599-00151
Reviewer: Madhurima Moulik**

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	1.0	10.0	400	0.076	0.8	276.5
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	1.0	10.0	400	0.076	0.8	276.5
Totals			20.0		20.0			1.5	553.0

Average Vehicle Weight Per Trip = tons/trip
Average Miles Per Trip = miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	7.9	7.9	7.9	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext =
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.716	0.143	0.0352	lb/mile
Mitigated Emission Factor, Eext =	0.655	0.131	0.0321	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.10	0.02	0.00	0.09	0.02	0.00	0.09	0.02	0.00
Vehicle (leaving plant) (one-way trip)	0.10	0.02	0.00	0.09	0.02	0.00	0.09	0.02	0.00
Totals	0.20	0.04	0.01	0.18	0.04	0.01	0.18	0.04	0.01

Methodology

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

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

January 26, 2016

Mr. Dave Hill
Knapheide Truck Equipment Company
1200 South Averill Avenue
Flint, MI 48503-2975

Re: Public Notice
Knapheide Truck Equipment Company
Permit Level: New Source Construction and
Federally Enforceable State Operating Permit
(FESOP)
Permit Number: 019-36599-00151

Dear Mr. Hill:

Enclosed is a copy of your draft New Source Construction and Federally Enforceable State Operating Permit (FESOP), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Evening News in Jeffersonville, Indiana publish the abbreviated version of the public notice no later than January 29, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Jeffersonville Township Public Library, 211 East Court Avenue in Jeffersonville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Madhurima Moulik, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0868 or dial (317) 233-0868.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 26, 2016

Evening News
221 Spring Street
Jeffersonville, IN 47130

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Knapheide Truck Equipment Company, Clark County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than January 29, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Madhurima Moulik at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: New Source Construction and
Federally Enforceable State Operating Permit (FESOP)
Permit Number: 019-36599-00151

Enclosure

PN Newspaper.dot 8/27/2015



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Governor

Carol S. Comer
Commissioner

January 26, 2016

To: Jeffersonville Township Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Knapheide Truck Equipment Company
Permit Number: 019-36599-00151

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

January 26, 2016
Knapheide Truck Equipment Company
019-36599-00151

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 8/27/2015

Mail Code 61-53

IDEM Staff	VHAUN 1/26/2016 Knapheide Truck Equipment Company 019-36599-00151 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Dave Hill Knapheide Truck Equipment Company 1200 S Averill Ave Flint MI 48503-2975 (Source CAATS)										
2		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
3		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
4		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)										
5		Jeffersonville Twp Public Library 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)										
6		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
7		Mr. Joseph VanCamp Cornerstone Environmental 312 E Diamond St. Kendallville IN 46755 (Consultant)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
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