# PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY and VIGO COUNTY AIR POLLUTION CONTROL

# Great Dane Trailers, Incorporated 4901 North 13<sup>th</sup> Street Terre Haute, Indiana 47805

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

Operation Permit No.: T167-7793-00011	
Issued by: Original Signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 5, 2002 Expiration Date: June 5, 2007

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#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
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#### **Compliance Determination Requirements**

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**Emergency Occurrence Report** 

**Quarterly Report** 

**Quarterly Deviation and Compliance Monitoring Report** 

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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) and Vigo County Air Pollution Control (VCAPC). 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer manufacturing plant.

Responsible Official: Plant Manager

Source Address: 4901 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805 Mailing Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805

General Source Phone Number: (812)460-0553

SIC Code: 3715 County Location: Vigo

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD Rules;

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) paint booth, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (b) One (1) paint booth, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- (c) One (1) paint booth, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.
- (d) One (1) paint booth, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
- (e) One (1) paint booth, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

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

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6-1].

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- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
  - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].
- (g) Cleaners and solvents characterized as follows:
  - (a) Having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100EF) or;
  - (b) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68EF);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6-1].
- (i) Water based adhesives that are less than or equal to 5% by volume VOCs excluding HAPs.
- Replacement or repair of electrostatic precipators, bags in baghouses and filters in other filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- On-site fire and emergency response training approved by the department.
- (m) Stationary fire pumps.
- (n) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-1].
- (o) Filter or coalescer media changeout.

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

#### **SECTION B**

#### **GENERAL CONDITIONS**

# B.1 Definitions [326 IAC 2-7-1]

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

#### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, 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.

# B.3 Enforceability [326 IAC 2-7-7]

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

#### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

# B.5 Severability [326 IAC 2-7-5(5)]

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

#### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

# B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute. Indiana 47807

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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(b) The Permittee shall furnish to IDEM, OAQ, and VCAPC within a reasonable time, any information that IDEM, OAQ, and VCAPC 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and VCAPC copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

# B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

# B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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 in letter form no later than July 1 of each year to:

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Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

and

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

- (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, and VCAPC 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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and VCAPC may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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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 Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and VCAPC. IDEM, OAQ, and VCAPC may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, and VCAPC within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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#### IDEM, OAQ

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

#### **VCAPC**

Telephone Number: 812-462-3433 Facsimile Number: 812-462-3447

(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 Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ, and VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and VCAPC 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 2-7 and any other applicable rules.
- (g) 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.

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#### B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or VCAPC shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or VCAPC has issued the modification. [326 IAC 2-7-12(b)(7)]

#### B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,

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- (2) revised, or
- (3) deleted

by this permit.

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

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute. Indiana 47807

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (f) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

# B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or VCAPC 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 2-7-9(a)(3)]

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- (c) Proceedings by IDEM, OAQ, or VCAPC 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and VCAPC and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

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- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) 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, and VCAPC on or before the date it is due.
  - (2) If IDEM, OAQ, and VCAPC, upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] 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 2-7 until IDEM, OAQ, and VCAPC, 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 in writing by IDEM, OAQ, and VCAPC, any additional information identified as being needed to process the application.

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(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, and VCAPC fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

#### B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

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Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under 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 Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and VCAPC in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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#### B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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, and VCAPC U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) 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 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and VCAPC within 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, or VCAPC, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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#### **SECTION C**

#### SOURCE OPERATION CONDITIONS

#### **Entire Source**

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (b) (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.2 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### Incineration [326 IAC 4-2] [326 IAC 9-1-2] C.3

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

#### C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

#### Operation of Equipment [326 IAC 2-7-6(6)] C.5

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

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

- 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.
- The Permittee shall ensure that a written notification is sent on a form provided by the (b) 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:

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(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 Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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.
- Indiana Accredited 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 Accredited Asbestos Inspector to
  thoroughly inspect the affected portion of the facility for the presence of asbestos. The
  requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61,
  Subpart M, is federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ and VCAPC 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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and VCAPC, if the source submits to IDEM, OAQ and VCAPC 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. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

## C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

- C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
  - (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
  - (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
  - (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

# Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

#### C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

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(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### C.15 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.

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(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

# C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 take appropriate response actions. The Permittee shall
  submit a description of these response actions to IDEM, OAQ and VCAPC, within thirty
  (30) days of receipt of the test results. The Permittee shall take appropriate action to
  minimize excess emissions from the affected facility while the response actions are
  being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ and VCAPC reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

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(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement 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, and VCAPC on or before the date it is due.

#### C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept 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 or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 Great Dane Trailers, Incorporated Page 25 of 36
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Vigo County Air Pollution Control 103 South Third Street Terre Haute, Indiana 47807

- (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, and VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### **Stratospheric Ozone Protection**

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]:

- (1) One (1) paint booth, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (2) One (1) paint booth, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- (3) One (1) paint booth, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.
- (4) One (1) paint booth, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
- (5) One (1) paint booth, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 01, unit 02, unit 03, unit 04, and unit 05 in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coating, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coating.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-167-4064-00011, issued on December 12, 1994, the entire source combined shall use less than 250 tons of VOC (since it is not one of the 28 listed source categories), including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 365 consecutive day period. Condition D.1.2 and D.2.1 combined will make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

#### D.1.4 Particulate Matter (PM) [326 IAC 6–1]

Pursuant to 326 IAC 6-1, the PM from the paint booths shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

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#### **Compliance Determination Requirements**

# D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage 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) using formulation data supplied by the coating manufacturer.

#### D.1.6 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each calendar month based on the total volatile organic compound usage for each day.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (01, 02, 03, 04, 05, 06, and 07) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D1.8 Particulate Matter (PM)

In order to comply with D.1.4, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, unit number 03, unit number 04, and unit number 05) are in operation.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Usage shall be defined in this permit as the amount of any material that is employed in an operation. Consumption shall be defined as the amount of material that is not recovered for salvage or reuse. The relationship between these two terms is defined as: Consumption (lb) = Material usage (lb) Material recovered (lb).
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day:

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(4) The cleanup solvent consumption for each day, including the solvent material usage and the solvent material recovered;

- (5) The total VOC consumption for each day, including the VOC material usage and the VOC material recovered; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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#### **SECTION D.2**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]:

- (1) A portable, cold cleaner degreaser with a maximum capacity less than 145 gallons per 12 months.
- (2) Brazing equipment, cutting torches, soldering equipment, and welding equipment.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-167-4064-00011, issued on December 12, 1994, the entire source combined shall use less than 250 tons of VOC (since it is not one of the 28 listed source categories), including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 365 consecutive day period. Condition D.2.1 and D.1.2 combined will make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the cold cleaner degreaser.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1, the PM from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

#### D.2.4 Cold cleaner operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations constructed after January 1, 1990, the owner or operator shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.5 Cold cleaner operation [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.

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(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### **Compliance Determination Requirements**

#### D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each calendar month based on the total volatile organic compound usage for each day.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION**

and

# **VIGO COUNTY AIR POLLUTION CONTROL**

# **PART 70 OPERATING PERMIT CERTIFICATION**

Great Dane Trailers, Incorporated Source Name:

4901 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805 Source Address:

	ing Address: 70 Permit No.:	4955 North 13 <sup>st</sup> Street, Terre Haute, Indiana 47805 167-7793-00011
	This certification	shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
	Please check wha	t document is being certified:
9	Annual Compliand	ce Certification Letter
9	Test Result (spec	ify)
9	Report (specify)	
9	Notification (speci	fy)
9	Affidavit (specify)	
9	Other (specify)	
		n information and belief formed after reasonable inquiry, the statements and ument are true, accurate, and complete.
Sig	gnature:	
Pri	nted Name:	
Titl	le/Position:	
Ph	one:	
Da	te:	

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY **COMPLIANCE BRANCH** 100 North Senate Avenue

P.O. Box 6015 Indianapolis, Indiana 46206-6015

Phone: 317-233-5674 Fax: 317-233-5967

and

**VIGO COUNTY AIR POLLUTION CONTROL** 

103 South Third Street Terre Haute. Indiana 47807 Phone: 812-462-3433 Fax: 812-462-3447

#### **PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT**

Source Name: Great Dane Trailers, Incorporated

4901 North 13th Street, Terre Haute, Indiana 47805 Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805 Mailing Address:

Part 70 Permit No.: 167-7793-00011

# This form consists of 2 pages

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This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A Facility/Equipment/Operation: Control Equipment: Permit Condition or Operation Limitation in Permit: Description of the Emergency: Describe the cause of the Emergency:

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if any of the following are not applicable, ma	rk N/A Page 2	2 OT 2	
Date/Time Emergency started:			
Date/Time Emergency was corrected:			
Was the facility being properly operated at Describe:	the time of the emergency? Y N		
Type of Pollutants Emitted: TSP, PM-10, So	O <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:		
Estimated amount of pollutant(s) emitted do	uring emergency:		
Describe the steps taken to mitigate the pro	oblem:		
Describe the corrective actions/response st	teps taken:		
Describe the measures taken to minimize e	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:			

A certification is not required for this report.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION** and **VIGO COUNTY AIR POLLUTION CONTROL**

# Part 70 Quarterly Report

Source Name: Great Dane Trailers, Incorporated

4901 North 13th Street, Terre Haute, Indiana 47805 Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805 Mailing Address:

Part 70 Permit No.: 167-7793-00011

Great Dane trailers, Incorporated shall use less than 250 tons of VOC, including Limit:

coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period.

Month:	Year:	

	VOC	VOC		VOC	VOC
Day	consumption	consumption	Day	consumption	consuption for
	this day (ton/day)	for the last 365 - day		this day (ton/day)	the last 365 - day period
	, ,,,	period		, ,,	, ,
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16					

Submitted by:	
Signature:	
Date:	

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION** and **VIGO COUNTY AIR POLLUTION CONTROL**

# **PART 70 OPERATING PERMIT** QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Great Dane Trailers, Incorporated

4901 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805 4955 North 13<sup>th</sup> Street. Terre Haute. Indiana 47805 Source Address: Mailing Address:

Part 70 Permit No.: 167-7793-00011	Friaute, indiana 47003		
Months:to	Year:		
	Page 1 of 2		
This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".			
9 NO DEVIATIONS OCCURRED THIS REPORTIN	NG PERIOD.		
9 THE FOLLOWING DEVIATIONS OCCURRED T	HIS 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:			

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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:	

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality and Vigo County Air Pollution Control

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Great Dane Trailers, incorporated

Source Location: 4901 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805

County: Vigo SIC Code: 3715

Operation Permit No.: T167-7793-00011
Permit Reviewer: Darren Woodward

On January 17, 2002, Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) had a notice published in the Terre Haute Tribune Star, Terre Haute, Indiana, stating that Great Dane Trailers, Incorporated had applied for a Part 70 Operating Permit to operate a stationary trailer manufacturing plant. The notice also stated that VCAPC and OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 30, 2002, Great Dane Trailers, Incorporated submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

#### Comment 1:

Great Dane Trailers, Incorporated requested that the language in the "Facility Description" item (3) and (5) to be corrected to match the language in A.2(c) and A.2(e), Respectively.

#### **Response to Comment 1:**

The Facility Description for (3) and (5) was corrected to match A.2(c) and A.2(e).

#### Comment 2:

Great Dane Trailers, Incorporated requested that A.1 naming John Flathman as the responsible party be changed to the position of "Plant Manager".

#### **Response to Comment 2:**

A.1 was revised to indicate position "Plant Manager" as the responsible party.

#### Comment 3:

Great Dane Trailers, Incorporated requested that D.1.2 (Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-10]) be removed from the permit since they do not coat wood panels or any wood components at this facility.

#### **Response to Comment 3:**

D.1.2 (Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-10]) has been removed from the permit.

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#### Comment 4:

Great Dane Trailers, Incorporated requested a language change for D.2.3. The provisions of D.2.3 limit PM emissions from welding, brazing, cutting torches and soldering equipment to an atmospheric discharge concentration limit of 0.03 grains/dscf. Great Dane Trailers, Incorporated requested a change from "....atmospheric discharge" to "....ambient air discharge".

#### **Response to Comment 4:**

The language within the Indiana Administrative Codes specifically states "atmospheric", therefore, there was no language change.

The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19th, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at <a href="http://www.state.in.us/idem/air/rules/apcb/packets/index.html">http://www.state.in.us/idem/air/rules/apcb/packets/index.html</a>. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the internet at <a href="http://www.IN.gov/legislative/register/index-25.html">http://www.IN.gov/legislative/register/index-25.html</a>.

- 1. Add the new rule cite to B.2 Permit Term.
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, 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.

- 2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16.
- B.12 Emergency Provisions [326 IAC 2-7-16]
  - 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 2-7-16.
  - (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:
  - (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 materials of substantial economic value.

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

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed.

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#### B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

4. B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

#### B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.
- 5. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
  - (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- 6. C.18 Compliance Response Plan Failure to Take Response Steps (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed.
- C.18 Compliance Response Plan Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
  - (c) The Permittee is not required to take any further response steps for any of the following reasons:
    - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
    - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment a minor permit modification to the permit, and such request has not been denied.

# Indiana Department of Environmental Management Office of Air Quality and Vigo County Air Pollution Control

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### **Source Background and Description**

Source Name: Great Dane Trailers, Incorporated

Source Location: 4901 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805

County: Vigo County

SIC Code: 3715

Operation Permit No.: T167-7793-00011

Permit Reviewer: Darren Woodward - VCAPC

The Office of Air Quality (OAQ) and Vigo County Air Pollution Control have reviewed a Part 70 permit application from Great Dane Trailers, Incorporated relating to the operation of a trailer manufacturing plant.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Great Dane Trailers, Incorporated has the following surface coating booths:
  - (1) One (1) paint booth, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
  - (2) One (1) paint booth, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
  - (3) One (1) paint booth, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.
  - (4) One (1) paint booth, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
  - (5) One (1) paint booth, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6-1].
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
  - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].
- (g) Cleaners and solvents characterized as follows:
  - (a) Having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100EF) or;
  - (b) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68EF);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6-1].
- (i) Water based adhesives that are less than or equal to 5% by volume VOCs excluding HAPs.
- (j) Replacement or repair of electrostatic precipators, bags in baghouses and filters in other filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- On-site fire and emergency response training approved by the department.
- (m) Stationary fire pumps.

- (n) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-1].
- (o) Filter or coalescer media changeout.

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 11-3715-01-95, issued on February 4, 1995.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on September 21, 1998.

#### **Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 8 through 10.

#### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE 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	greater than 250		
PM-10	greater than 250		
SO <sub>2</sub>	less than 25		
VOC	greater than 250		
СО	less than 25		
NO <sub>x</sub>	less than 25		

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)				
Ethylbenzene	greater than 10				
Mek	greater than 10				
Toluene	greater than 10				
Xylene	greater than10				
MIK	greater than 10				
Methanol	less than 10				
Glycol Ether	less than 10				
TOTAL	greater than 25				

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter and volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
  Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)			
PM	0.0			
PM-10	0.0			
SO <sub>2</sub>	0.0			
VOC	107.6			
СО	0.1			
NO <sub>x</sub>	0.7			
HAP (specify)	Combination of HAP's = 23.8			

#### **County Attainment Status**

The source is located in Vigo County.

Pollutant	Status		
PM-10	attainment		
SO <sub>2</sub>	attainment		
$NO_2$	attainment		
Ozone	attainment		
CO	attainment		
Lead	attainment		

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Vigo County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Federal Rule Applicability**

- (a) Great Dane Trailers, Incorporated is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), due to the size of the tanks. Great Dane Incorporated's tanks are below the 40 cubic meters (10,560 gallon) threshold.
- (b) Great Dane Trailers, Incorporated is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, due to the solvents used. The solvents required by Subpart T are not used at the Great Dane facility.

#### State Rule Applicability - Entire Source

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

Pursuant to CP-167-4064-00011, issued on December 12, 1994, this facility shall use less than 250 tons of VOC (since it is not one of the 28 listed source categories), including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. CP-167-4064-00011 is the latest modification for Great Dane Trailers, Incorporated.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Opacity Limitations)

Great Dane Trailers, Incorporated is located outside of the coordinates that limits the opacity to thirty percent (30%). Therefore, 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:

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- (a) Opacity shall not exceed an average of forty percent (40%) 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.

#### 326 IAC 6-1-2 (Particulate emission limitation)

Pursuant to 326 IAC 6-1-2 (Particulate emission limitation), facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

#### State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at unit 01, unit 02, unit 04, and unit 05, shall be limited to the following when coating miscellaneous metal:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)		
Clear Coat	4.3		
Air Dried Coat	3.5		

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### 326 IAC 8-3-2 (Cold cleaner operation)

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations constructed after January 1, 1990, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts:
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-3-4 (Conveyorized degreaser operation)

Great Dane Trailers, Incorporated is not subject to the requirements of 326 IAC 8-3-4, due to the type of degreaser. Great Dane Trailers, Incorporated does not have a conveyorized degreaser operation.

#### 326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

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- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
- (B) The solvent is agitated; or
- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### 326 IAC 8-4-3 (Petroleum liquid storage facilities)

Great Dane Trailers, Incorporated is not subject to the requirements of 326 IAC 8-4-3 (Petroleum liquid storage facilities), due to the size of the tanks. Great Dane Trailers, Incorporated's tanks are below the 39,000 gallon threshold.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- 1. The surface coating booths have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (01, 02, 03, 04, 05, 06, and 07) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### Conclusion

The operation of this trailer manufacturing plant, shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-7793-00011**.

### **Actual Calculations**

#### **Particulate Matter:**

Unit	Stack	Booth ID	Max. Rate	Throughput	PM	
Number	ID		gal/hr	gal/yr	Emission TPY	
1	01	Bogie	20	175,200	0.028	
2	02	Undercoat	30	262,800	0.019	
3	03	Fab. Primer	10	87,600	0.005	
	04	Fab. Primer			0.005	
4	05	Fab. 5th Wheel	10	87,600	0.01	
5	06	Fab. Topcoat	15	131,400	0.042	
	07	Fab. Topcoat			0.042	
			<b>Total Emiss</b>	sion	0.151	

#### VOC:

Unit	Stack	Booth ID	Max. Rate Throughput		VOC	
Number	ID		gal/hr	gal/yr	Emission TPY	
1	01	Bogie	20	175,200	7.72	
2	02	Undercoat	30	262,800	3.96	
3	03	Fab. Primer	10	87,600	0.64	
	04	Fab. Primer			0.64	
4	05	Fab. 5th Wheel	10	87,600	1.48	
5	06	Fab. Topcoat	15	131,400	5.41	
	07	Fab. Topcoat			5.41	
		·	Total Emission		25.26	

## Great Dane Trailers, Incorporated Reviewer: Darren Woodward

#### **HAP Calculations**

Unit	Stack	Booth ID	Max. Rate	Potential	Actual	HAP	Actual	Potential
Number	ID		gal/hr	Throughput	Throughput		Emission TPY	<b>Emission TPY</b>
				gal/yr	gal/yr			
1	01	Bogie	20	175,200	5,554	Ethylbenzene	0.00	0.00
						MEK	0.10	3.29
						Toluene	0.09	2.79
						Xylene	0.19	6.09
						MIK	0.08	2.45
						Methanol	0.01	0.20
						Glycol Ether	0.00	0.03
2	02	Undercoat	30	262,800	3,709	Ethylbenzene	0.12	8.19
						MEK	0.18	12.45
						Toluene	0.14	9.71
						Xylene	0.24	17.25
						MIK	0.13	8.98
						Methanol	0.01	0.63
						Glycol Ether	0.00	0.00
3	03	Fab. Primer	10	87,600	899.5	Ethylbenzene	0.020	0.93
						MEK	0.020	0.93
						Toluene	0.000	0.00
						Xylene	0.105	5.19
						МIК	0.000	0.00
						Methanol	0.000	0.00
						Glycol Ether	0.000	0.00
	04	Fab. Primer			899.5	Ethylbenzene	0.020	0.93
						MEK	0.020	0.93
						Toluene	0.000	0.00
						Xylene	0.105	5.19
						MIK	0.000	0.00
						Methanol	0.000	0.00
						Glycol Ether	0.000	0.00
4	05	Fab. 5th Wheel	10	87,600	1759	Ethylbenzene	0.00	0.00
				,		MEK	0.00	0.00
						Toluene	0.00	0.00
						Xylene	0.23	11.68
						MIK	0.00	0.00
						Methanol	0.00	0.00
						Glycol Ether	0.00	0.00
5	06	Fab. Topcoat	15	131,400	7,516.5	Ethylbenzene	0.065	0.58
						MEK	0.065	0.58
						Toluene	0.000	0.00
				ĺ		Xylene	1.385	12.09
				ĺ		MIK	0.000	0.00
						Methanol	0.000	0.00
						Glycol Ether	0.000	0.00
	07	Fab. Topcoat			7,516.5	Ethylbenzene	0.065	0.58
						MEK	0.065	0.58
						Toluene	0.000	0.00
						Xylene	1.385	12.09
				ĺ		MIK	0.000	0.00
						Methanol	0.000	0.00
						Glycol Ether	0.000	0.00
				Total HAP I	Emissions	Olycon Euror	4.84	124.34