

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**HTL, LLC
Route 9 at I 80/90
Howe, Indiana 46746**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-087-9259-00014	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information	4
A.2	Emission Units and Pollution Control Equipment Summary	4
A.3	Part 70 Permit Applicability	4
SECTION B	GENERAL CONDITIONS	5
B.1	General Construction Conditions	5
B.2	Effective of the Permit [IC13-15-5-3]	5
B.3	Revocation of Permits [326 IAC 2-1-9(b)]	5
B.4	Permit Review Rules [326 IAC 2]	5
B.5	First Time Operation Permit [326 IAC 2-1-4]	5
B.6	General Operation Conditions	6
B.7	Preventive Maintenance Plan [326 IAC 1-6-3]	6
B.8	Malfunction Report [326 IAC 1-6-2]	6
B.9	Transfer of Permit [326 IAC 2-1-6]	7
B.10	Permit Revocation [326 IAC 2-1-9]	7
B.11	Availability of Permit [326 IAC 2-1-3(l)]	7
SECTION C	SOURCE OPERATION CONDITIONS	8
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	PSD Minor Source Status [326 IAC 2-2] [40 CFR52.21]	8
C.2	Opacity [326 IAC 5-1]	8
C.3	Operation of Equipment [326 IAC 2-7-6(6)]	8
C.4	Stack Height [326 IAC 1-7]	8
C.5	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	8
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.6	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	9
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]	9
	Record Keeping Requirements [326 IAC 2-8-4(3)]	
C.8	General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]	10
	Stratospheric Ozone Protection	
C.9	Compliance with 40 CFR 82 and 326 IAC 22-1	11
SECTION D.1	FACILITY OPERATION CONDITIONS	
	Utility Trailer Fabrication	11
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.1.1	Volatile Organic Compounds [326 IAC 8-2-9]	12
D.1.2	PM Process Operation [326 IAC 6-3]	12
D.1.3	Preventative Maintenance Plan	

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) 13
D.1.5 Testing Requirements 13

Compliance Monitoring Requirements

D.1.6 Particulate Matter (PM).13
D.1.7 Monitoring 13

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

D.1.8 Record Keeping Requirements 13&14

Malfunction Report 15 & 16

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

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

The Permittee owns and operates a utility trailer fabrication and assembly operation.

Responsible Official: Greg Tackett
Source Address: Route 9 at I 80/90, Howe, IN. 46746
Mailing Address: 400 East Logan Street, Markle, IN. 46770
SIC Code: 3469
County Location: Lagrange
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules
Minor Source, under Title V Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) powder coating booth, with a maximum metal stock throughput of 9,000 lbs/hr.
- (b) One (1) air atomization paint booth, with a maximum metal part throughput of 3,000 lbs/hr and exhausts to a stacks designated as PB1.
- (c) One (1) three stage metal preparation washer; phosphate cleaner, water rinse, and rinse and seal, with a maximum metal stock throughput of 9,000 lbs/hr and exhausts to vents designated as WV1 and WV2.
- (d) Seven (7) natural gas building heater units, with a maximum heat input capacity of 20.8 mm Btu/hr.
- (e) Two (2) natural gas burner units utilized for stages one (1) and three (3) of the metal preparation washer line, with a total heat input capacity of 7.8 mmBtu/hr and exhausts to stacks designated as PW1 and PW3.
- (f) One (1) natural gas combination dry off and curing oven, with a maximum metal stock throughput of 9,000 lbs/hr, a maximum heat input capacity of 4.2 mmBtu/hr, and exhausts to a vent designated as.
- (g) One (1) sand abrasive metal cleaning booth, with a maximum flow rate of 25 lbs/hr and exhausts to a stack designated as AB1.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source shall not be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

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

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1 (Fees).

Operation Conditions

B.6 General Operation Conditions

-
- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
 - (c) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Malfunctions Report [326 IAC 1-6-2]

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

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

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this utility trailer fabrication and assembly operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

B.10 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.11 Availability of Permit [326 IAC 2-1-3(I)]

Pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the potential emissions to the following:
 - 1. 25 tons per year or more (326 IAC 2-1),
 - 2. 100 tons per year or more, and are greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),
 - 3. 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.4 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the 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.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

**C.5 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos,

including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the 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 mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) 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 is federally enforceable.

Record Keeping Requirements

C.8 General Record Keeping Requirements

- (a) Records of all required monitoring data 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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Stratospheric Ozone Protection

C.9 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.

SECTION D.1

FACILITY CONDITIONS

- (a) One (1) powder coating booth, with a maximum metal stock throughput of 9,000 lbs/hr.
- (b) One (1) air atomization paint booth, with a maximum metal part throughput of 3,000 lbs/hr, controlled by a dry filter and exhausts to a stacks designated as PB1.
- (c) One (1) three stage metal preparation washer; phosphate cleaner, water rinse, and rinse and seal, with a maximum metal stock throughput of 9,000 lbs/hr and exhausts to vents designated as WV1 and WV2.
- (d) Seven (7) natural gas building heater units, with a maximum heat input capacity of 20.8 mm Btu/hr.
- (e) Two (2) natural gas burner units utilized for stages one (1) and three (3) of the metal preparation washer line, with a total heat input capacity of 7.8 mmBtu/hr and exhausts to stacks designated as PW1 and PW3.
- (f) One (1) natural gas combination dry off and curing oven, with a maximum metal stock throughput of 9,000 lbs/hr, a maximum heat input capacity of 4.2 mmBtu/hr, and exhausts to a vent designated as.
- (g) One (1) sand abrasive metal cleaning booth, with a maximum flow rate of 25 lbs/hr and exhausts to a stack designated as AB1.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the metal inserts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Extreme Performance Coat	3.5

- (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 PM Process Operations [326 IAC 6-3]:

Pursuant to 326 IAC 6-3 (Process Operations), the following facilities shall have a PM allowable emissions using the following equation:

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

Where: E = PM allowable emissions in pounds hour
 P = Process weight rate in tons per hour.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compound (VOC) Compliance Determination

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements

D.1.6 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in placed when paint booth, PB-1 is in operation.

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, daily observations shall be made of the overspray while the booth is 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) Weekly 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 an overspray emission, evidence of overspray emission, or other abnormal 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.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Record Keeping and Reporting Requirements

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (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 month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly 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.

MALFUNCTION REPORT

**applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

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

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

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: HTL, LLC
Source Location: Route 9 at I 80/90, Howe, Indiana 46746
County: Lagrange
Construction Permit No.: CP-087-9259-00014
SIC Code: 3469
Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from HTL, LLC relating to the construction and operation of a utility trailer fabrication and assembly operation consisting of the following equipment:

- (a) One (1) powder coating booth, with a maximum metal stock throughput of 9,000 lbs/hr.
- (b) One (1) air atomization paint booth, with a maximum metal part throughput of 3,000 lbs/hr, controlled by a dry filter and exhausts to a stacks designated as PB1.
- (c) One (1) three stage metal preparation washer; phosphate cleaner, water rinse, and rinse and seal, with a maximum metal stock throughput of 9,000 lbs/hr and exhausts to vents designated as WV1 and WV2.
- (d) Seven (7) natural gas building heater units, with a maximum heat input capacity of 20.8 mm Btu/hr.
- (e) Two (2) natural gas burner units utilized for stages one (1) and three (3) of the metal preparation washer line, with a total heat input capacity of 7.8 mmBtu/hr and exhausts to stacks designated as PW1 and PW3.
- (f) One (1) natural gas combination dry off and curing oven, with a maximum metal stock throughput of 9,000 lbs/hr, a maximum heat input capacity of 4.2 mmBtu/hr, and exhausts to a vent designated as.
- (g) One (1) sand abrasive metal cleaning booth, with a maximum flow rate of 25 lbs/hr and exhausts to a stack designated as AB1.

This existing source was previously owned and operated by United Technologies Automotive. HTL, LLC has recently purchased the building to the existing referenced source. All existing permitted facilities have since been removed. HTL, LLC also operates under a different Standard Industrial Classification Number, 3469, than United Technologies Automotive. This source will then be considered a new source.

For tracking purposes, HTL, LLC is designated the same Plant ID 00014 that United Technologies Automotive was previously assigned. The new source is minor for both PSD and Title V status.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
WV1	wash unit vapor vent	23	2	6000	Ambient
WV2	wash unit vapor vent	23	2	6400	100
BO1(A, B, and C)	oven vents	23	2	4200	200
PB1	paint booth	25	4	26000	Ambient
AB1	abrasive cleaning booth	25	1.5	5000	Ambient
PW1	stage 1 wash	23	1	1600	200
PW3	stage 2 wash	23	1	750	200

Recommendation

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

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

An application for the purposes of this review was received on November 21, 1997.

Emissions Calculations

- (a) See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (seven (7) pages).
- (b) The abrasive cleaning emission calculations were determined as follows:
 $25 \text{ lbs/hr} * 0.041 \text{ lb PM/ lb abrasive} = 1.025 \text{ lb/hr}$
 $1.025 \text{ lb /hr} * 8760 \text{ hr/yr} / 2000 \text{ lb/ton} = \mathbf{4.49 \text{ ton/yr.}}$
- (c) The three stage metal preparation washer does not have any VOC emissions.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
-----------	---------------------------------	---------------------------------

Particulate Matter (PM)	45.73	45.73
Particulate Matter (PM10)	45.73	45.73
Sulfur Dioxide (SO ₂)	--	0.00
Volatile Organic Compounds (VOC)	30.85	25.46
Carbon Monoxide (CO)	--	3.8
Nitrogen Oxides (NO _x)	--	16.5
Xylene	--	4.92
Toluene	--	2.25
Methyl Ethyl Ketone	--	4.89
Methyl Isobutyl Ketone	--	2.43
Ethyl Benzene	--	1.88
Manganese Oxides	--	2.40
Combination of HAPs	--	18.14

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3-2 and 326 IAC 8-2-9.

(i) 326 IAC 6-3 (Process Operations):

The paint booth and abrasive booth and the curing oven shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67}; \quad \text{where } P = \text{process weight in tons per hour}$$

$$E = \text{rate of emission in pounds per}$$

hour.

(ii) 326 IAC 8-2-9 (VOC Limitations):

The limit for performance paint is 3.5 lbs VOC/gal of coating less water applied. The source is in compliance with this limit of 3.5 lbs VOC/gal of coating less water applied.

The allowable emissions are determined by linear interpolation (worst case):

$$24.86 \text{ potential VOC emissions} / 2.82 \text{ potential lb VOC / gal of coating less water} \\ = X \text{ (allowable VOC emissions)} / 3.5 \text{ allowable lb VOC / gal of coating less water.}$$

Therefore, $X = 30.85$ tons/yr.

(b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of VOC and PM are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (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. Lagrange 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) Lagrange County has been classified as attainment or unclassifiable for NO_x, particulate matter, CO, and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	45.73
PM10	45.73
SO ₂	0.0
VOC	25.46
CO	3.8
NO _x	16.5
Toluene	2.25
Methyl Ethyl Ketone	4.89
Methyl Isobutyl Ketone	2.43
Ethyl benzene	1.88
Manganese Oxides	2.40
Xylene	4.92
Combination HAPs	18.14

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit

(PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards 40 CFR Part 60 applicable to this facility.
- (b) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The dry filters for particulate matter overspray control shall be in operation at all times when the paint booth and abrasive cleaning booth are in operation.
- (b) The paint booth and abrasive booth shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour}$$

- (c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray 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 shall be considered a violation of this construction permit.
- (d) Weekly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an over spray emission, evidence of overspray emission, or other abnormal 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 shall be considered a violation of this construction permit.

- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

326 IAC 1-6-3 (Preventative Maintenance):

- (a) The Permittee shall prepare and maintain Preventative Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventative Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

326 IAC 8-2-9 (VOC Limitations)

This source is subject to 326 IAC because it coats miscellaneous metal parts under the Standard Industrial Classification Code of 3469 and was constructed after July 1, 1991.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of the coatings applied to miscellaneous metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Extreme Performance Coatings	3.5

Based on emission calculations (page 6) this source is in compliance with the 3.5 lb VOC per gallon of coating less water limit.

326 IAC 8-2-9 (Emission Minimization):

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.

No other 326 IAC 8 rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached spreadsheets for detailed air toxic calculations (page 7 of 7).
- (c) 326 IAC 2-1-3.4 (MACT) does not apply to the source because there are no HAPs emitted.

Conclusion

The construction of this utility trailer fabrication and assembly operation will be subject to the conditions of the attached proposed **Construction Permit No. CP-087-9259-00014**.

HAP Emission Calculations

Company Name: HTI-LLC
Plant Location: Route 9 at I 80/90, Howe, IN. 46746
County: LaGrange
Permit Reviewer: NLJ
Date: 12/31/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Manganese Oxide	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Managnese Oxides Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer (PB1)	13.98	5.000000	0.188	4.17%	0.00%	4.17%	4.17%	4.17%	0.00%	2.40	0.00	2.40	2.40	2.40	0.00
TopCoat (PB1)	10.54	5.000000	0.188	3.96%	3.96%	3.96%	0.00%	0.00%	3.96%	1.72	1.72	1.72	0.00	0.00	1.72
FM-50 Cleaner	7.02		0.093	27.90%	18.60%	26.80%	1.00%	0.00%	5.60%	0.80	0.53	0.77	0.03	0.00	0.16

Total State Potential Emissions 4.92 2.25 4.89 2.43 2.40 1.88

METHODOLOGY

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

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler**

Company Name: HTI, LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt ID: 087-000
Reviewer: NLJ
Date: 12/30/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.2

36.8

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.2	0.2	0.0	1.8	0.1	0.4

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10**

Company Name: HTI, LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt ID: 087-000
Reviewer: NLJ
Date: 12/30/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.0

43.8

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.3	0.3	0.0	2.2	0.1	0.5

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10**

Company Name: HTI, LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt ID: 087-000
Reviewer: NLJ
Date: 12/30/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.8

24.5

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.0	1.2	0.1	0.3

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Two Building heat units**

Company Name: HTI, LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt ID: 087-000
Reviewer: NLJ
Date: 12/30/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.8

77.1

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.5	0.5	0.0	3.9	0.2	0.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 10 < MM BTU/HR <100
 Five Building Heat Units**

Company Name: HTI, LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt ID: 087-000
Reviewer: NLJ
Date: 1/15/98

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.0

105.1

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.7	0.7	0.0	7.4	0.1	1.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

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

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

Company Name: HTI-LLC
Address City IN Zip: Route 9 at I 80/90, Howe, IN. 46746
CP: 087-9259
Plt. ID: 087-00014
Reviewer: NLJ
Date: 12/31/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
PowderCoat	10.9	0.06%	0.0%	0.1%	0.0%	99.92%	0.069	90.000	0.01	0.01	0.04	0.98	0.18	0.00	0.01	100%
Primer Paint (PB1)	14.0	17.85%	0.0%	17.9%	0.0%	65.05%	5.000	0.188	2.50	2.50	2.34	56.15	10.25	23.58	3.84	50%
Top Coat Paint (PB1)	10.5	26.72%	0.0%	26.7%	0.0%	62.41%	5.000	0.188	2.82	2.82	2.64	63.37	11.56	15.86	4.51	50%
FM-50 Cleaner***	7.0	100.00%	0.0%	100.0%	0.0%	0.00%		0.093	7.02	7.02	0.65	15.70	2.87	0.00	0.00	0%

*** Note: FM-50 gal/hr rate was determined by the maximum gallon usage per year divided by the actual hours of operation in a year.
410 gal/yr * yr/4400 hrs = 0.932 gal/hr.

State Potential Emissions

Add worst case coating to all solvents

5.67

136.19

24.86

39.44

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: HTL, LLC
 Source Location: Route 9 at I 80/90, Howe, Indiana 46746
 County: Lagrange
 Construction Permit No.: CP-087-9259-00014
 SIC Code: 3469
 Permit Reviewer: Nysa L. James

On January 28, 1998, the Office of Air Management (OAM) had a notice published in the Lagrange Publishing Company, Lagrange, Indiana, stating that HTL, LLC had applied for a construction permit to construct and operate a utility trailer manufacturing operation with control. The notice also stated that OAM proposed to issue a permit for this installation 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.

Upon further review on February 18, 1998, the OAM determined that the following changes to the proposed construction permit are required: (changes are bolded for emphasis)

1. OAM has determined that record keeping is sufficient to demonstrate compliance, therefore Section C.6, on page 9 of 16, Compliance Schedule of the Compliance Monitoring Requirements, originally written as the following:

~~**C.6 Compliance Schedule [326 IAC 2-7-6(3)]**~~

~~The Permittee:~~

- ~~(a) Will continue to comply with such requirements that become effective during the term of this permit; and~~
- ~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~
- ~~(c) Has certified that all facilities at this source are in compliance with all applicable requirements.~~

shall be replaced with the Compliance Monitoring requirements, on page 9 of 16, is amended to read as follows:

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015**

Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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).

2. OAM determined that record keeping was necessary to demonstrate compliance. Therefore, Section D.1.8, Record Keeping Requirements, shall be added into the construction permit and shall read as follows:

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(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 month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly 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.

3. OAM determined that record keeping is sufficient to determine compliance. Therefore, Section D.1.4, Volatile Organic Compound (VOC) Compliance on page 13 of 16 originally written as the following:

D.1.4 Volatile Organic Compounds (VOC) Compliance Determination

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.4~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and ~~326 IAC 8-1-2(a)(7)~~ using

formulation data supplied by the coating manufacturer. IDEM and OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4,

shall be amended to read as follows:

D 1.4 Volatile Organic Compound (VOC) Compliance Determination

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.