NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Haulmark Trailers of IN, Inc. in Elkhart County

Significant Permit Revision No.: 039-41420-00254

The Indiana Department of Environmental Management (IDEM) has received an application from Haulmark Trailers of IN, Inc., located at 14054 CR 4 East, Bristol, Indiana 46507, for a significant revision of its FESOP issued on July 5, 2017. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Haulmark Trailers of IN, Inc. to make certain changes at its existing source. Haulmark Trailers of IN, Inc. has applied to construct a new paint booth and modify a paint station, undercoating operation, adhesive spraying process, and assembly operation.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

  Bristol Public Library
  505 W. Vistula St.
  Bristol, IN 46507

  and

  IDEM Northern Regional Office
  300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
  South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website ([https://www.in.gov/idem/5474.htm](https://www.in.gov/idem/5474.htm)) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 039-41420-00254 in all correspondence.

**Comments should be sent to:**

Doug Logan  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Doug Logan or (317) 234-5328  
Or dial directly: (317) 234-5328  
Fax: (317) 232-6749 attn: Doug Logan  
E-mail: dlogan@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

**What will happen after IDEM makes a decision?**

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

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Mr. Jeff Howes  
Haulmark Trailers of IN, Inc.  
1503 McNaughton Avenue  
Elkhart, Indiana 46514

Re: 039-41420-00254  
Significant Revision to  
F039-37790-00254

Dear Mr. Howes:

Haulmark Trailers of IN, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F039-37790-00254, on July 5, 2017, for a stationary metal cargo trailer manufacturing source located at 14054 CR 4 East, Bristol, Indiana 46507. On May 6, 2019, the Office of Air Quality (OAQ) received an application from the source requesting construction of a new paint booth and modification of a paint station, undercoating operation, adhesive spraying process, and assembly operation. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

- One (1) undercoating and topcoat paint station, identified as EU-01A, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using HVLP and airless spray applicators, using dry filters as control, exhausting to Stacks S-1 and S-2.
- One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.
- One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.
- One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.
- One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.
The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

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

Commenced Construction

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2. Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Doug Logan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

Sincerely,

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
Federally Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

Haulmark Trailers of IN, Inc.
14054 CR 4 East
Bristol, Indiana 46507

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

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<tr>
<td>Master Agency Interest ID.: 32566</td>
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<tr>
<td>Original Signed /Issued by:</td>
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<tr>
<td>Jenny Acker, Section Chief</td>
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<tr>
<td>Permits Branch</td>
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<tr>
<td>Office of Air Quality</td>
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<td>Issuance Date: July 5, 2017</td>
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<td>Expiration Date: July 5, 2027</td>
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Administrative Amendment No. 039-40716-00254, issued on November 30, 2018.

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<td>Brian Williams, Section Chief</td>
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SECTION A  

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal cargo trailer manufacturing source.

| Source Address: | 14054 CR 4 East, Bristol, Indiana 46507 |
| General Source Phone Number: | 574-264-9661 |
| SIC Code: | 3715 (Truck Trailers) |
| County Location: | Elkhart |
| Source Location Status: | attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program |
| | Minor Source, under PSD |
| | Minor Source, Section 112 of the Clean Air Act |
| | Not 1 of 28 Source Categories |

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

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

(a) One (1) paint station, identified as EU-01A, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using HVLP and airless spray applicators, using dry filters as control, exhausting to Stacks S-1 and S-2.

(b) One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.

(c) One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.

(d) One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.

(e) One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.

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

This stationary source also includes the following insignificant activities:

(a) Combustion related activities, including:

   (1) Space heaters, process heaters, heat treat furnaces, or boilers using the
following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, as follows.

(i) One (1) natural gas-fired curing area, included in EU-06A, with a maximum heat input capacity of 0.67 MMBtu/hr, exhausting to stacks S-1 and S-2.

(ii) One (1) natural gas-fired air makeup air heater for EU-01A, identified as EU-06A, with a maximum heat input capacity of 7.86 MMBtu/hr, exhausting to stacks S-1 and S-2.

(iii) One (1) natural gas-fired air makeup heater for EU-05, identified as EU-06B, permitted in 2019, with a maximum heat input capacity of 1.90 MMBtu/hr, exhausting to stacks S-3 and S-4.

(B) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning treated wood or chemically contaminated wood, as follows:

(i) One (1) wood burning heater for comfort heating, identified as EU-07, installed in October 2005, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack S-5.

(2) Combustion source flame safety purging on startup.

(b) Fuel dispensing activities, including:

(1) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, as follows:

(A) One (1) diesel fuel storage tank, identified as EU-11, constructed in 1995, permitted in 2019, with a maximum capacity of 300 gallons.

(c) Production related activities, constructed in 1998, exhausting indoors, including the following:

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(A) Cutting torches, identified as EU-09, with a maximum capacity of fourteen (14) cuts one (1) inch or less in length in stock one (1) inch in thickness or less per hour.

(B) Welding equipment, identified as EU-08, as follows:

(i) Four (4) steel MIG welding stations, with a maximum capacity of 56 pounds of wire per hour, each.

(ii) One (1) aluminum MIG welding station, with a maximum capacity of 4.21 pounds of wire per hour.

(d) Paved and unpaved roads and parking lots with public access, identified as EU-12.
(e) 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 three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute as follows:

(1) Woodworking operations, identified as EU-10, constructed in 1995, permitted in 2019, as follows:

(A) Three (3) table saws, controlled by a filter bag with a maximum flow rate of 1,500 acfm, exhausting indoors.

(f) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

- For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
- For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
- For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
- For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
- For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
- For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

As follows:

(1) Two (2) wood-cutting chop saws, included in EU-10, permitted in 2019, using no controls.

(2) Activities performed using hand-held equipment, consisting of:

(A) Grinding, as follows:

   (i) Hand-held grinding to prepare trailer frame welds for painting, identified as EU-13, constructed in 1995, permitted in 2019.

(B) Sawing, as follows:

   (i) Two (2) wood cutting circular saws, included in EU-10, permitted in 2019.

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

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

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

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

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

(a) This permit, F039-37790-00254, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-37790-00254 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a
certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

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

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

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;
(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as
such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.
(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,
Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any
monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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

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

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. initial inspection and evaluation;

2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

3. any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. monitoring results;

2. review of operation and maintenance procedures and records; and/or

3. inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint station, identified as EU-01A, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using HVLP and airless spray applicators, using dry filters as control, exhausting to Stacks S-1 and S-2.

(b) One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.

(c) One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.

(d) One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.

(e) One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.

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

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

D.1.1 PSD Minor Limits and FESOP Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) Minor Limitations [326 IAC 2-8-4] [326 IAC 2-4.1] [40 CFR 63]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) Toluene input to the paint stations EU-01A and EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) Methanol input to the undercoating and touchup spray application process EU-02, and assembly process EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Methylene chloride input to the adhesive spray application process, EU-03, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Ethylene glycol input to the assembly process, EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) Xylenes input to paint station EU-01A, undercoating and touchup spray application process EU-02, assembly process EU-04, and paint station EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(f) The combined input of ethylene glycol, methanol, methylene chloride, toluene, and xylenes to paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05 shall not exceed a total of 19.66 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit each single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit combined HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal the Permittee shall not allow discharge into the atmosphere from the surface coating operations, identified as paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05, VOC in excess of 3.5 pounds of VOCs per gallon of coating, excluding water, as delivered to the applicator.


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

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

D.1.5 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from paint station EU-01A and paint station EU-05 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

\[ A = \left[ \frac{\sum (C \times U)}{\sum U} \right] \]

Where:

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

The daily volume weighted average of VOC content from the paint station (EU-01), undercoating and touchup process (EU-02), assembly process (EU-04), and paint station (EU-05) shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Hazardous Air Pollutants (HAP) Emissions

(a) In order to demonstrate compliance with Condition D.1.2(a), the Permittee shall determine toluene input for EU-01A and EU-05 according to the following formula:

\[ E_T = \frac{[(G_{1A} + G_S) \times T_C] + (S_{1A} + S_S) \times T_S]}{2,000 \text{ lb/ton}} \]

Where

- \( E_T \) = Monthly toluene emissions, tons/month
- \( G_{1A} \) = Monthly Z Shield 7800 HG usage in EU-01A, gal/month
G5 = Monthly Z Shield 7800 HG usage in EU-05, gal/month
TC = Toluene emission factor for Z Shield 7800 HG, lb/gal
S1A = Monthly gun cleaning solvent usage in EU-01A, gal/month
S5 = Monthly gun cleaning solvent usage in EU-05, gal/month
TS = Toluene emission factor for gun cleaning solvent, lb/gal

(b) In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall determine methanol input for EU-02 and EU-04 according to the following formula:

\[ E_{MA} = \frac{(U_T \times M_{AT}) + (A_4 \times M_{AA}) + (S_4 \times M_{AS})}{2,000 \text{ lb/ton}} \]

Where
- \( E_{MA} \) = Monthly methanol emissions, tons/month
- \( U_T \) = Monthly aerosol touchup undercoating usage in EU-02, gal/month
- \( M_{AT} \) = Methanol emission factor for undercoating touchup, lb/gal
- \( A_4 \) = Monthly total adhesive usage in EU-04, gal/month
- \( M_{AA} \) = Methanol emission factor for sealants, lb/gal
- \( S_4 \) = Monthly total sealant usage in EU-04, gal/month
- \( M_{AS} \) = Methanol emission factor for sealants, lb/gal

(c) In order to demonstrate compliance with Condition D.1.2(c), the Permittee shall determine methylene chloride input for EU-03 according to the following formula:

\[ E_{MC} = \frac{(A_3 \times M_C)}{2,000 \text{ lb/ton}} \]

Where
- \( E_{MC} \) = Monthly methylene chloride emissions, tons/month
- \( A_3 \) = Monthly PB925 adhesive usage in EU-03, gal/month
- \( M_C \) = Methylene chloride emission factor for adhesive PB925, lb/gal

(d) In order to demonstrate compliance with Condition D.1.2(d), the Permittee shall determine ethylene glycol input for EU-04 according to the following formula:

\[ E_{EG} = \frac{(S_4 \times E_{AS})}{2,000 \text{ lb/ton}} \]

Where
- \( E_{EG} \) = Monthly ethylene glycol emissions, tons/month
- \( S_4 \) = Monthly total sealant usage in EU-04, gal/month
- \( E_{AS} \) = Ethylene glycol emission factor for sealants, lb/gal

(e) In order to demonstrate compliance with Condition D.1.2(e) the Permittee shall determine xylenes input according to the following formula:

\[ E_{EX} = \frac{[(G_{1A}+G_5) \times X_C]+[(S_{1A}+S_5) \times X_S]+(U \times X_U)+(S_4 \times X_{AS})}{2,000 \text{ lb/ton}} \]

Where
- \( E_{EX} \) = Monthly xylenes emissions, tons/month
- \( G_{1A} \) = Monthly Z Shield 7800 HG usage in EU-01A, gal/month
- \( G_5 \) = Monthly Z Shield 7800 HG usage in EU-05, gal/month
- \( X_C \) = Xylenes emission factor for Z Shield 7800 HG, lb/gal
- \( S_{1A} \) = Monthly gun cleaning solvent usage in EU-01A, gal/month
- \( S_5 \) = Monthly gun cleaning solvent usage in EU-05, gal/month
- \( X_S \) = Xylenes emission factor for gun cleaning solvent, lb/gal
- \( U \) = Monthly undercoating usage in EU-02, gal/month
- \( X_U \) = Xylenes emission factor for undercoating, lb/gal
In order to demonstrate compliance with Condition D.1.2(f) the Permittee shall determine combined HAP input according to the following formula:

\[ EC = ET + EMA + EMC + EE + EX \]

Where

- \( EC \) = Monthly combined HAP emissions, tons/month
- \( ET \) = Monthly toluene emissions, tons/month
- \( EMA \) = Monthly methanol emissions, tons/month
- \( EMC \) = Monthly methylene chloride emissions, tons/month
- \( EE \) = Monthly ethylene glycol emissions, tons/month
- \( EX \) = Monthly xylenes emissions, tons/month

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

D.1.10 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 paint station EU-01A stacks S-1 and S-2 while the unit is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks S-1 and S-2 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(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, weekly observations shall be made of the overspray from the paint station EU-05 stacks S-3 and S-4 while the unit is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(d) Monthly inspections shall be performed of the coating emissions from stacks S-3 and S-4 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1)
through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs and VOC usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available no later than thirty (30) days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC, ethylene glycol, methanol, methylene chloride, toluene, xylenes, and combined HAPs usage for each month.

(5) The total VOC, ethylene glycol, methanol, methylene chloride, toluene, xylenes, and combined HAPs usage for each compliance period.

(b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material used less water.

(2) The amount of coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted average VOC content less water of the coatings used for each day.

(c) To document the compliance status with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.

(d) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 Reporting Requirements

A quarterly report of VOC, toluene, methanol, methylene chloride, ethylene glycol, xylenes, and combined HAP emissions and quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to
the reporting required by this condition. The report submitted by the Permittee does require a
certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as
defined by 326 IAC 2-1.1-1(1).
## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

**Insignificant Activities:**

(e) 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 three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute as follows:

1. Woodworking operations, constructed in 1995, permitted in 2019, as follows:
   (A) Three (3) table saws, identified as EU-10, controlled by a filter bag with a maximum flow rate of 1,500 acfm, exhausting indoors.

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

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

**D.2.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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

**D.2.2 Particulate Control**

In order to assure that the table saws (EU-10) are not subject to the requirements of 326 IAC 6-3-2, the integral filter bag for particulate control shall be in operation and control emissions from the table saws (EU-10) at all times the table saws (EU-10) are in operation.

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

**D.2.3 Filter Inspections**

The Permittee shall perform semi-annual inspections of the bag filter controlling particulate emissions from the table saws (EU-10) to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

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

**D.2.4 Record Keeping Requirements**

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.3.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
Emissions Unit Description:

Insignificant Activities:

(a) Combustion related activities, including:

   (1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:

   (B) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning treated wood or chemically contaminated wood, as follows:

      (i) One (1) wood burning heater for comfort heating, identified as EU-07, installed in October 2005, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack S-5.

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

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

D.3.1 Type of Wood Used [326 IAC 4-2]

In order to render the requirements of 326 IAC 4-2 (Incinerators) not applicable, the Permittee shall burn only clean wood in heater EU-07.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromated copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board and oriented strand board).

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.3.3 Wood Inspections

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform visual inspections of all wood received at heater EU-07 for combustion at the time of delivery to collection area. Inspections shall be conducted by trained plant personnel. The inspections shall be conducted to ensure that the material being fed to heater EU-07 does not contain any of the following material:

(a) Treated, painted or coated wood-based material; or

(b) Non-wood material (i.e., plastic, fiberglass, metal, rubber, etc.)

Any materials listed above shall be rejected and discarded.
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.3, the Permittee shall maintain records on a daily basis of all visual wood inspections, and the results of each inspection. The records shall include the date of inspection and name of person performing the inspection. The Permittee shall include in its daily record when inspections are not made for the day and the reason for the lack of inspections, (e.g. heater EU-07 was not in operation or did not receive any loads to the collection area that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254

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

 Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)___________________________________________________
☐ Affidavit (specify)_______________________________________________________
☐ Other (specify)_________________________________________________________

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

Signature:

Printed Name:

Title/Position:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254

This form consists of 2 pages Page 1 of 2

☐ 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) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Describe:</td>
<td></td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>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:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05
Parameter: VOC input
Limit: The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
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</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: _________________________________________
Title / Position: _________________________________________
Signature: _________________________________________
Date: _________________________________________
Phone: _________________________________________
Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Paint stations EU-01A and EU-05
Parameter: Toluene input
Limit: Toluene input to the paint stations EU-01A and EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
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<tbody>
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<table>
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<tbody>
<tr>
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</tbody>
</table>

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Undercoating and touchup spray application process EU-02, and assembly process EU-04
Parameter: Methanol input
Limit: Methanol input to the undercoating and touchup spray application process EU-02, and assembly process EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

| QUARTER: | YEAR: __________________________ |

<table>
<thead>
<tr>
<th>Month</th>
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<tbody>
<tr>
<td>This Month</td>
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<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: __________________________

Submitted by: __________________________
Title / Position: __________________________
Signature: __________________________
Date: __________________________
Phone: __________________________
FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Adhesive spray application process EU-03
Parameter: Methylene chloride input
Limit: Methylene chloride input to the adhesive spray application process, EU-03, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
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<tbody>
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</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: ________________________________

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Assembly process EU-04
Parameter: Ethylene glycol input
Limit: Ethylene glycol input to the assembly process, EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: ____________________ YEAR: ____________________

<table>
<thead>
<tr>
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<tr>
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</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
  Deviation has been reported on: __________________________

Submitted by: __________________________
Title / Position: __________________________
Signature: __________________________
Date: __________________________
Phone: __________________________
Source Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Permit No.: F039-37790-00254
Facility: Paint station EU-01A, undercoating and touchup spray application process EU-02, assembly process EU-04, and paint station EU-05
Parameter: Xylenes input
Limit: Xylenes input to paint station EU-01A, undercoating and touchup spray application process EU-02, assembly process EU-04, and paint station EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
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- [ ] No deviation occurred in this quarter.
- [ ] Deviation/s occurred in this quarter.
  Deviation has been reported on: ______________________________

Submitted by: _________________________________________
Title / Position: _________________________________________
Signature: _________________________________________
Date:  _________________________________________
Phone:  _________________________________________
**INFORMATION DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Haulmark Trailers of IN, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>14054 CR 4 East, Bristol, Indiana 46507</td>
</tr>
<tr>
<td>FESOP Permit No.:</td>
<td>F039-37790-00254</td>
</tr>
<tr>
<td>Facility:</td>
<td>Paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05</td>
</tr>
<tr>
<td>Parameter:</td>
<td>Combined HAP input</td>
</tr>
<tr>
<td>Limit:</td>
<td>The combined input of ethylene glycol, methanol, methylene chloride, toluene, and xylenes to paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05 shall not exceed a total of 19.66 tons per twelve (12) consecutive month period with compliance determined at the end of each month.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>QUARTER :</th>
<th>YEAR:</th>
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</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
  Deviation has been reported on: ___________________________

Submitted by: ___________________________
Title / Position: ___________________________
Signature: ___________________________
Date: ___________________________
Phone: ___________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

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<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
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<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<td>Number of Deviations:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<tbody>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________
Title / Position: _______________________________
Date: _______________________________
Phone: _______________________________
Source Description and Location

Source Name: Haulmark Trailers of IN, Inc.
Source Location: 14054 CR 4 East, Bristol, Indiana 46507
County: Elkhart
SIC Code: 3715 (Truck Trailers)
Operation Permit No.: F 039-37790-00254
Operation Permit Issuance Date: July 5, 2017
Significant Permit Revision No.: 039-41420-00254
Permit Reviewer: Doug Logan

Existing Approvals

The source was issued FESOP Renewal No. 039-37790-00254 on July 5, 2017. The source has since received the following approval:

(a) Administrative Amendment No. 039-40716-00254, issued on November 30, 2018

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 annual NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X. The 1-hour standard was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) PM$_{2.5}$
Elkhart County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

**Greenhouse Gas (GHG) Emissions**

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

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

**Source Status - Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM$_1$</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP*</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>99.71</td>
<td>99.86</td>
<td>99.72</td>
<td>0.01</td>
<td>5.13</td>
<td>99.94</td>
<td>4.85</td>
<td>&lt;10</td>
<td>24.98</td>
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### Source-Wide Emissions Prior to Revision (ton/year)

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<tr>
<th>Source Type</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
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</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
2. PM$_{2.5}$ listed is direct PM$_{2.5}$.
3. Single highest source-wide HAP, n-hexane

*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Renewal No. 039-37790-00254, issued on July 5, 2017.

### Emission Units and Pollution Control Equipment Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)

As part of this permitting action, the source requested to add the following existing emission unit(s) constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):

(a) Combustion related activities, including:
   (1) Combustion source flame safety purging on startup.

   This emission unit is identified under (326 IAC 2-1-1-3(e)(5)).

(b) Fuel dispensing activities, including:
   (1) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, as follows:
      (A) One (1) diesel fuel storage tank, identified as EU-11, constructed in 1995, permitted in 2019, with a maximum capacity of 300 gallons.

   This emission unit is identified under (326 IAC 2-1-1-3(e)(6)(B)).

(c) Paved and unpaved roads and parking lots with public access, identified as EU-12.

   This emission unit is identified under (326 IAC 2-1-1-3(e)(16))

(d) 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 three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute as follows:
(1) Woodworking operations, constructed in 1995, permitted in 2019, as follows:

(A) Three (3) table saws, identified as EU-10, controlled by a filter bag with a maximum flow rate of 1,500 acfm, exhausting indoors.

This emission unit is identified under (326 IAC 2-1-1-3(e)(26)(F)

(e) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

- For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
- For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
- For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
- For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
- For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
- For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

As follows:

(1) Two (2) wood-cutting chop saws, included in EU-10, permitted in 2019, using no controls.

This emission unit is identified under (326 IAC 2-1-1-3(e)(1).

(f) Activities performed using hand-held equipment, which are trivial activities as defined at 326 IAC 2-7-1(42), consisting of:

(1) Grinding, as follows:

(A) Hand-held grinding to prepare trailer frame welds for painting, identified as EU-13, constructed in 1995, permitted in 2019.

(2) Sawing, as follows:

(A) Two (2) wood cutting circular saws, included in EU-10, permitted in 2019.

This emission unit is identified under (326 IAC 2-1-1-3(e)(35).

The emission units is/are identified under 326 IAC 2-1.1-3(e)(2) - (46) (Exemptions) and the addition of the emission units did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the permit revision requirements under 326 IAC 2-8-11.1, including the requirement to submit an application, do not apply to the emission units. See Appendix A of this Technical Support Document for detailed emission calculations.

| Description of Proposed Revision |

The Office of Air Quality (OAQ) has reviewed an application, submitted by Haulmark Trailers of IN, Inc. on May 6, 2019, relating to construction of a new paint booth and modification of a paint station, undercoating operation, adhesive spraying process, and assembly operation.

The following is a list of the new and modified emission units and pollution control device(s):
(a) One (1) undercoating and topcoat paint station, identified as EU-01A, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using HVLP and airless spray applicators, using dry filters as control, exhausting to Stacks S-1 and S-2.

(b) One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.

(c) One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.

(d) One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.

(e) One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.

The following is a list of new insignificant activities:

(a) Combustion related activities, including:

(1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, as follows.

(i) One (1) natural gas-fired air makeup heater for EU-05, identified as EU-06B, permitted in 2019, with a maximum heat input capacity of 1.90 MMBtu/hr, exhausting to stacks S-3 and S-4.

The following is a list of modified insignificant activities:

(a) Production related activities, constructed in 1998, exhausting indoors, including the following:

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(A) Cutting torches, identified as EU-09, with a maximum capacity of fourteen (14) cuts one (1) inch or less in length in stock one (1) inch in thickness or less per hour.

(B) Welding equipment, identified as EU-08, as follows:

(i) Four (4) steel MIG welding stations, with a maximum capacity of 56 pounds of wire per hour, each.

(ii) One (1) aluminum MIG welding station, with a maximum capacity of 4.21 pounds of wire per hour.

Note: The source reports that EU-08 was described incorrectly in earlier permits as four aluminum and one steel welding stations instead of as described above. Discussed here as modified because of the correction.
to the descriptive information, PTE actually decreased because IDEM, OAQ has applied emission factors that are considered to better represent the process.

"Integral Part of the Process" Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Station (EU-05)</td>
<td>99.16</td>
<td>99.16</td>
<td>99.16</td>
<td>-</td>
<td>-</td>
<td>433.76</td>
<td>-</td>
<td>0</td>
<td>25.64</td>
</tr>
<tr>
<td>Make-up air heater</td>
<td>1.55E-02</td>
<td>6.20E-02</td>
<td>6.20E-02</td>
<td>4.90E-03</td>
<td>0.82</td>
<td>4.49E-02</td>
<td>0.69</td>
<td>-</td>
<td>1.54E-02</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>99.18</td>
<td>99.23</td>
<td>99.23</td>
<td>4.90E-03</td>
<td>0.82</td>
<td>433.81</td>
<td>0.69</td>
<td>0</td>
<td>25.65</td>
</tr>
</tbody>
</table>

1PM_{2.5} listed is direct PM_{2.5}.
2Source-wide single highest HAP, methylene chloride
3Pursuant to the decision in Cause Nos. 92-A-J-730 and 92-A-J-833, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.
### PTE Increase of the Modified Emission Units (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅&lt;sup&gt;₁&lt;/sup&gt;</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;²&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTE Before Modification (EU-01A)</td>
<td>433.30</td>
<td>433.30</td>
<td>433.30</td>
<td>-</td>
<td>-</td>
<td>746.33</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PTE After Modification (EU-01A)</td>
<td>99.16</td>
<td>99.16</td>
<td>99.16</td>
<td>-</td>
<td>-</td>
<td>433.76</td>
<td>-</td>
<td>0</td>
<td>25.64</td>
</tr>
<tr>
<td><strong>PTE Increase (EU-01A)</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>0</td>
<td>25.64</td>
</tr>
<tr>
<td>PTE Before Modification (EU-02)</td>
<td>1.09</td>
<td>1.09</td>
<td>1.09</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PTE After Modification (EU-02)</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>3.10</td>
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<td>0</td>
<td>0.10</td>
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<tr>
<td><strong>PTE Increase (EU-02)</strong></td>
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<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>3.10</td>
<td>-</td>
<td>0</td>
<td>0.10</td>
</tr>
<tr>
<td>PTE Before Modification (EU-03)</td>
<td>18.10</td>
<td>18.10</td>
<td>18.10</td>
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<td>-</td>
<td>48.80</td>
<td>-</td>
<td>0</td>
<td>1.22</td>
</tr>
<tr>
<td>PTE After Modification (EU-03)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>6.58</td>
<td>-</td>
<td>117.37</td>
<td>117.37</td>
</tr>
<tr>
<td><strong>PTE Increase (EU-03)</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>117.37</td>
<td>117.37</td>
</tr>
<tr>
<td>PTE Before Modification (EU-04)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>PTE After Modification (EU-04)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>148.19</td>
<td>-</td>
<td>0</td>
<td>50.25</td>
</tr>
<tr>
<td><strong>PTE Increase (EU-04)</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>148.19</td>
<td>-</td>
<td>0</td>
<td>50.25</td>
</tr>
<tr>
<td>PTE Before Modification (EU-08 &amp; EU-09)</td>
<td>10.61</td>
<td>10.61</td>
<td>10.61</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>2.73</td>
</tr>
<tr>
<td>PTE After Modification (EU-08 &amp; EU-09)</td>
<td>6.54</td>
<td>6.54</td>
<td>6.54</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>0.31</td>
</tr>
<tr>
<td><strong>PTE Increase (EU-08 &amp; EU-09)</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the Modified Emission Unit(s)/Process</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>151.29</td>
<td>-</td>
<td>117.37</td>
<td>192.14</td>
</tr>
</tbody>
</table>

<sup>₁</sup>PM₂.₅ listed is direct PM₂.₅.

<sup>²</sup>Source-wide single highest HAP, methylene chloride.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

### PTE Increases Due to the Revision (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅&lt;sup&gt;₁&lt;/sup&gt;</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;²&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE Before Controls of the New Emission Units</td>
<td>99.18</td>
<td>99.23</td>
<td>99.23</td>
<td>4.90E-03</td>
<td>0.82</td>
<td>433.81</td>
<td>0.69</td>
<td>0</td>
<td>25.66</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Units</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>151.29</td>
<td>-</td>
<td>117.37</td>
<td>192.14</td>
</tr>
</tbody>
</table>
Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

(i) PM, PM₁₀, or direct PM₂.₅
(ii) Volatile Organic Compounds (VOC).

Pursuant to 326 IAC 2-8-11.1(f)(1)(G), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision has a potential to emit greater than or equal to ten (10) tons per year of a single HAP and/or twenty-five (25) tons per year of any combination of HAPs.

### PTE Increases Due to the Revision (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂₅₁</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP²</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of the Revision</td>
<td>99.18</td>
<td>99.23</td>
<td>99.23</td>
<td>4.90E-05</td>
<td>0.82</td>
<td>585.10</td>
<td>0.69</td>
<td>117.37</td>
<td>217.79</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.
²Source-wide single highest HAP, methylene chloride.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take VOC, single HAP, and combined HAP limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration...
(PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the makeup air heater, EU-06B, because the unit is not a steam generating unit as defined at 40 CFR 60.41c and because the maximum heat input capacity of the unit is 1.90 MMBtu/hr which is less than the applicability threshold of 10 MMBtu/hr in 40 CFR 60.40c(a).

(b) The requirements of the Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for the paint station, EU-05, because the source is not an automobile or light truck assembly plant. As defined at 40 CFR 60.391, automobiles and light trucks are motor vehicles. The source manufactures unpowered trailers.

(c) The requirements of the Standards of Performance for New Residential Wood Heaters, 40 CFR 60, Subpart AAA and 326 IAC 12, are still not included in the permit for the wood burning heater, installed in 2005, because the unit is not an adjustable burn rate wood heater, single burn rate wood heater, or pellet stove manufactured on or after July 1, 1988, with a current EPA certificate of compliance issued prior to May 15, 2015 according to the certification procedures in effect in subpart AAA at the time of certification. Prior to May 15, 2015, the definition of “wood heater” at 40 CFR 60.531 excluded units weighing more than 800 kg (1,760 pounds). The wood burning heater at the source weighs 3,950 pounds and it does not have a certificate of compliance with Subpart AAA issued prior to May 15, 2015. Therefore, the wood burning heater is not an affected source as defined at 40 CFR 60.530(a)(1).

(d) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are still not included in the permit for adhesive spray application process, EU-03, since the process is not a plywood and composite wood products manufacturing facility as defined at 40 CFR 63.2292 and the source is not a major source of HAP emissions. The facility does not manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or
agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85, are not included in the permit for the paint station, EU-05, since the unit does not apply topcoat to new automobile bodies, new light truck bodies, or body parts for new automobiles or new light trucks and the source is not a major source of HAP emissions.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for the paint station, EU-05, since the source is not a major source of HAP emissions.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for the air makeup heater, EU-06B, since the unit is not a boiler or process heater as defined at 40 CFR 63.7575 and the source is not a major source of HAP emissions.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC, are not included in the permit for the diesel fuel dispensing facility, EU-11, since the unit dispenses diesel fuel, not gasoline.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit for the paint station, EU-05, since the unit does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit for the adhesive spray process, EU-03, since the unit is not a paint stripping operation that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes. The process applies an adhesive that contains methylene chloride as a carrier solvent.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the air makeup heater, EU-06B, since the unit is not a boiler as defined at 40 CFR 63.11237.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit for the welding (EU-08), cutting (EU-09) and grinding (EU-13) processes because the source is not primarily engaged in operations in one of the nine source categories listed in 40 CFR 63.11514(a)(1)-(9).

(m) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.
Compliance Assurance Monitoring (CAM):

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

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>326 IAC 2-2 (PSD)</td>
</tr>
<tr>
<td>PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.</td>
</tr>
<tr>
<td>PSD Minor Source Limit(s)</td>
</tr>
<tr>
<td>In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:</td>
</tr>
<tr>
<td>(a) The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Due to this modification the existing PSD minor limits for PM, PM$_{10}$, and PM$_{2.5}$ for the paint station, identified as EU-01 A, and the plywood wall spray adhesive application process, identified as EU-03 have been removed since the source-wide unlimited potential to emit PM, PM$_{10}$, and PM$_{2.5}$ is less than 250 tons per year, each.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new and modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP PM$_{10}$ and PM$_{2.5}$ Limits
Due to this modification the existing FESOP PM$_{10}$ and PM$_{2.5}$ emission limits for the paint station, identified as EU-01A, and the plywood wall spray adhesive application process, identified as EU-03 have been removed since paint stations EU-01A and the new EU-05 are required to operate dry filters to comply with 326 IAC 6-3-2(d) and IDEM, OAQ has determined that the adhesive spray process EU-03 does not generate particulate matter emissions. Based on an overall control efficiency of 95% for the dry filters the source-wide potential to emit PM$_{10}$ and PM$_{2.5}$ is well below the Part 70 thresholds. Therefore, compliance with 326 IAC 6-3-2(d) renders the requirements of 326 IAC 2-7 (Part 70) not applicable.

FESOP VOC Limits
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process
EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**FESOP HAP Limits**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) Toluene input to the paint stations EU-01A and EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Methanol input to the undercoating and touchup spray application process EU-02, and assembly process EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Methylene chloride input to the adhesive spray application process, EU-03, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Ethylene glycol input to the assembly process, EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) Xylenes input to paint station EU-01A, undercoating and touchup spray application process EU-02, assembly process EU-04, and paint station EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(f) The combined input of ethylene glycol, methanol, methylene chloride, toluene, and xylenes to paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05 shall not exceed a total of 19.66 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

**State Rule Applicability – Individual Facilities**

Due to the proposed revision, state rule applicability has been reviewed as follows:

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

(a) Pursuant to 326 IAC 6-3-1.5(2), the processes listed in the table below are not subject to the requirements of 326 IAC 6-3, since IDEM, OAQ has determined that the processes do not emit particulate in the production of a product.
Application of Cobra HP topcoat in EU-01A using web spray methods
Application of asphalt undercoating in EU-02 using airless or HVLP methods
Application of adhesive in EU-03 using web spray methods
Application of Cobra HP topcoat in EU-05 using web spray methods

(b) Pursuant to 326 IAC 6-3-1(b)(7), the application of adhesives, caulks, and sealants in EU-04 is not subject to the requirements of 326 IAC 6-3, since the processes use flow-type application methods.

(c) Pursuant to 326 IAC 6-3-1(b)(9), the steel and aluminum welding processes in EU-08 are not subject to the requirements of 326 IAC 6-3, since the each process consumes less than 625 pounds of rod or wire per day.

(e) Pursuant to 326 IAC 6-3-1(b)(10), the torch cutting operation in EU-09 is not subject to the requirements of 326 IAC 6-3, since the process cuts less than 3,400 inches of stock one (1) inch in thickness or less per hour.

(f) Pursuant to 326 IAC 6-3-1(b)(12), the use of aerosol coating products in EU-02 is not subject to the requirements of 326 IAC 6-3, since the process repairs minor surface damage and imperfections.

(g) Pursuant to 326 IAC 6-3-1(b)(13), the use of hand held saws in EU-10 and use of hand held grinders in EU-13 are not subject to the requirements of 326 IAC 6-3, since the processes are trivial activities as defined at 326 IAC 2-7-1(42).

(h) Pursuant to 326 IAC 6-3-1(b)(14), the use of uncontrolled chop saws in EU-10 is not subject to the requirements of 326 IAC 6-3, since the processes have the potential to emit less than five hundred fifty-one thousandths (0.551) pounds of particulate matter per hour.

(i) Pursuant to 326 IAC 6-3-1(b)(14), the table saws in EU-10 are not subject to the requirements of 326 IAC 6-3, since the processes have the potential to emit less than five hundred fifty-one thousandths (0.551) pounds of particulate matter per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The paint station, EU-05 is not subject to the requirements of 326 IAC 8-1-6 because is regulated by other rules in 326 IAC 8. The unit is subject to the requirements of 326 IAC 8-2-9.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
(a) Pursuant to 326 IAC 8-2-1(a)(4) and 326 IAC 8-2-9(a)(1), the paint station, EU-05, is subject to the requirements of 326 IAC 8-2-9, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particular matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from the surface coating operation shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint station, EU-05 shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

(b) This unit is also subject to the work practices specified under 326 IAC 8-2-9(f).
(c) 326 IAC 8-1-2 (Compliance Methods)
Pursuant to 326 IAC 8-1-2(a)(7), when using non-compliant coatings in paint station EU-05, the source shall demonstrate compliance with the applicable 326 IAC 8-2-9 VOC content limitation(s), using a daily volume-weighted average of all coatings applied on a daily basis in paint station EU-05.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

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

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

\[ A = \frac{\left( \sum (C \times U) \right)}{\sum U} \]

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

The daily volume weighted average of VOC content from the paint station (EU-01), undercoating and touchup process (EU-02), assembly process (EU-04), and paint station (EU-05) shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water.

(3) HAP compliance determination

(i) The Permittee shall determine toluene input for EU-01A and EU-05 according to the following formula:

\[ E_T = \frac{\left\{ (G_{1A} + G_5) \times T_C \right\} + \left\{ (S_{1A} + S_5) \times T_S \right\}}{2,000 \text{ lb/ton}} \]

Where \( E_T = \) Monthly toluene emissions, tons/month
\( G_{1A} = \) Monthly Z Shield 7800 HG usage in EU-01A, gal/month
\( G_5 = \) Monthly Z Shield 7800 HG usage in EU-05, gal/month
\( T_C = \) Toluene emission factor for Z Shield 7800 HG, lb/gal
\( S_{1A} = \) Monthly gun cleaning solvent usage in EU-01A, gal/month
\( S_5 = \) Monthly gun cleaning solvent usage in EU-05, gal/month
\( T_S = \) Toluene emission factor for gun cleaning solvent, lb/gal

(ii) The Permittee shall determine methanol input for EU-02 and EU-04 according to the following formula:
(iii) The Permittee shall determine methylene chloride input for EU-03 according to the following formula:

\[ E_{MC} = \frac{(A_3 \times M_C)}{2,000 \text{ lb/ton}} \]

Where \( E_{MC} \) = Monthly methylene chloride emissions, tons/month
\( A_3 \) = Monthly PB925 adhesive usage in EU-03, gal/month
\( M_C \) = Methylene chloride emission factor for adhesive PB925, lb/gal

(iv) The Permittee shall determine ethylene glycol input for EU-04 according to the following formula:

\[ E_{E} = \frac{(S_4 \times E_{AS})}{2,000 \text{ lb/ton}} \]

Where \( E_{E} \) = Monthly ethylene glycol emissions, tons/month
\( S_4 \) = Monthly total sealant usage in EU-04, gal/month
\( E_{AS} \) = Ethylene glycol emission factor for sealants, lb/gal

(v) The Permittee shall determine xylenes input according to the following formula:

\[ E_{X} = \frac{\left\{ \left[ (G_{1A}+G_5) \times X_C \right] + \left[ (S_{1A}+S_5) \times X_S \right] + (U \times X_U) + (S_4 \times X_{AS}) \right\}}{2,000 \text{ lb/ton}} \]

Where \( E_{X} \) = Monthly xylenes emissions, tons/month
\( G_{1A} \) = Monthly Z Shield 7800 HG usage in EU-01A, gal/month
\( G_5 \) = Monthly Z Shield 7800 HG usage in EU-05, gal/month
\( X_C \) = Xylenes emission factor for Z Shield 7800 HG, lb/gal
\( S_{1A} \) = Monthly gun cleaning solvent usage in EU-01A, gal/month
\( S_5 \) = Monthly gun cleaning solvent usage in EU-05, gal/month
\( X_S \) = Xylenes emission factor for gun cleaning solvent, lb/gal
\( U \) = Monthly undercoating usage in EU-02, gal/month
\( X_U \) = Xylenes emission factor for undercoating, lb/gal
\( S_4 \) = Monthly total sealant usage in EU-04, gal/month
\( X_{AS} \) = Xylenes emission factor for sealants, lb/gal

(vi) The Permittee shall determine combined HAP input according to the following formula:

\[ E_{C} = E_T + E_{MA} + E_{MC} + E_{E} + E_{X} \]

Where \( E_{C} \) = Monthly combined HAP emissions, tons/month
\( E_T \) = Monthly toluene emissions, tons/month
\( E_{MA} \) = Monthly methanol emissions, tons/month
\( E_{MC} \) = Monthly methylene chloride emissions, tons/month
\[ EE = \text{Monthly ethylene glycol emissions, tons/month} \]
\[ EX = \text{Monthly xylenes emissions, tons/month} \]

Appendix A of this TSD includes values of emission factors that appear in (i) through (iv) for the coating products described in the application for SPR No. 039-41420-00254. While the source may revise the factors to accommodate minor changes to product formulations, changes that add pollutants or substantially change HAP emissions may require a permit revision.

(4) In order to assure that the table saws (EU-10) are not subject to the requirements of 326 IAC 6-3-2, the integral filter bag for particulate control shall be in operation and control emissions from the table saws (EU-10) at all times the table saws (EU-10) are in operation.

**Testing Requirements:**

IDEM, OAQ is not requiring testing for the paint station dry filters. The emissions limit, for these units can be maintained by a conservative control efficiency of 80%. Compliance monitoring conditions in conjunction with the preventive maintenance plan are sufficient to assure that the required control efficiency is achieved at all times.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dry filters, paint station EU-05</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
<tr>
<td>Bag filter, table saws EU-10</td>
<td>Inspection</td>
<td>Semi-annual</td>
<td>Verify that it is operated and maintained per manufacturer’s specifications</td>
</tr>
<tr>
<td>Wood-fired heater, EU-07</td>
<td>Wood inspections</td>
<td>On delivery</td>
<td>Verify that the heater fuel does not contain treated, painted or coated wood-based material, or non-wood material</td>
</tr>
</tbody>
</table>

(a) These monitoring conditions are necessary because the dry filters for the paint station must operate properly to assure compliance with 326 IAC 6-3-2(d).

(b) These monitoring conditions are necessary because the bag filter for the table saws must operate properly to assure that the unit is exempt from 326 IAC 6-3-2(e).

(c) These monitoring conditions are necessary because the wood-fired heater must burn only clean wood to assure that the unit is exempt from 326 IAC 4-2.
Proposed Changes

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

(1) At the request of the source, the source name has been corrected throughout the permit, as follows:

Haulmark Trailers of IN, Inc.

(2) Descriptive information in Condition A.2 - Emission Units and Pollution Control Equipment Summary and the Section D.1 emissions unit description box about existing units EU-01A, EU-02, EU-03, and EU-04 has been revised because of new materials and methods.

(3) IDEM, OAQ added a new emission unit EU-05 in Condition A.2 - Emission Units and Pollution Control Equipment Summary and the Section D.1 emissions unit description box.

(4) IDEM, OAQ made the following changes in Condition A.3 - Insignificant Activities:
   • Descriptions of existing insignificant activities were revised and reordered to follow the underlying rules more closely.
   • At the request of the source, new insignificant activities were added.
   • At the request of the source, the description of welding operations was corrected.

(5) IDEM, OAQ deleted the former Condition D.1.1 - Hazardous Air Pollutants (HAPs) Minor Limitations in its entirety.

(6) IDEM, OAQ inserted a new Condition D.1.1 - PSD Minor Limits and FESOP Limits to incorporate criteria pollutant limits appropriate to new and modified units.

(7) IDEM, OAQ inserted a new Condition D.1.2 - Hazardous Air Pollutants (HAPs) Minor Limitations to incorporate limits appropriate to new and modified units. Subsequent conditions were renumbered to accommodate inserted and deleted material.

(8) IDEM, OAQ updated Condition D.1.3 - Volatile Organic Compound (VOC) Limitations to current model language and revised the condition for new and modified units.

(9) IDEM, OAQ updated Condition D.1.4 - Volatile Organic Compound (VOC) Work Practices to current model language.

(10) IDEM, OAQ revised Condition D.1.5 - Particulate for new and modified units.

(11) IDEM, OAQ deleted former Conditions D.1.5 - Prevention of Significant Deterioration (PSD) PM Minor Limit, D.1.6 - Particulate Matter (PM\textsubscript{10} and PM\textsubscript{2.5}), and D.1.7 - Volatile Organic Compounds because new and modified units required extensive changes incorporated in new conditions.

(12) IDEM, OAQ updated Condition D.1.6 - Preventive Maintenance Plan to current model language.

(13) IDEM, OAQ updated Condition D.1.7 - Volatile Organic Compounds (VOC) to current model language and revised the citation of the limit to the revised Condition D.1.3.

(14) IDEM, OAQ revised the citation of limits in Condition D.1.8 - Volatile Organic Compounds (VOC) and clarified the reference to use of data sheet information.

(15) IDEM, OAQ deleted the former Condition D.1.11 - Particulate Matter (PM/PM\textsubscript{10}) Emissions Determination because under current guidance the use of filters with a rated control efficiency of 95% or greater and compliance monitoring provisions are considered to demonstrate compliance with 326 IAC 6-3-2(d).
(16) IDEM, OAQ added a new Condition D.1.9 - Hazardous Air Pollutants (HAP) Emissions to incorporate specific compliance determination requirements for HAPs limited under 326 IAC 2-8.

(17) IDEM, OAQ revised descriptive information for existing units in paragraphs (a) and (b) in Condition D.1.10 - Monitoring and added new paragraphs (c) and (d) to incorporate requirements for new units.

(18) IDEM, OAQ made the following changes in Condition D.1.11 - Record Keeping Requirements
- References in paragraph (a) to VOC and HAP limit conditions were updated
- A requirement to keep records of the HAP content of coating products was added in paragraph (a)(1)
- Specific HAPs with uncontrolled PTE greater than 10 tons per year were added to paragraphs (a)(4) and (5).
- References in paragraph (b) to the VOC content limit condition were revised.
- Paragraph (b) was updated to current model language.
- The former paragraph (c) was deleted because PM$_{10}$ and PM$_{2.5}$ limits were removed.
- Subsequent paragraphs were re-lettered.

(19) IDEM, OAQ revised the limit condition references in Condition D.1.12 - Reporting Requirements

(20) IDEM, OAQ made the following changes in Section D.2:
- Welding and cutting operations were deleted from the emission unit description box because those operations are exempt from 326 IAC 6-3.
- The former Condition D.2.1 - Particulate (PM) was deleted because the welding and cutting operations are exempt from 326 IAC 6-3.
- The table saws, unit EU-10, were added to the emissions unit description box.
- New requirements relating to the integral control device for unit EU-10 were added in Section D.2

(21) IDEM, OAQ added new Section D.3 to incorporate requirements for the wood-fired heater.

(22) IDEM, OAQ revised the FESOP Quarterly Report forms.

The entire permit has been revised as follows:

SECTION A SOURCE SUMMARY

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

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

(a) One (1) paint station, identified as EU-01A, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to Stacks S-1 and S-2, capacity: 15.0 metal cargo trailers per hour

(b) One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day.

One (1) paint station, identified as EU-01A, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.
One (1) plywood wall adhesive spray application process, identified as EU-03 and formerly part of the one (1) general assembly area, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, capacity: the plywood walls of 15.0 metal cargo trailers per hour.

One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.

One (1) general assembly area, identified as EU-04, using hand, brush, or caulk gun application methods, constructed in 1998, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour.

One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.

One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.

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

This stationary source also includes the following insignificant activities:

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Cutting torches with a maximum capacity of fourteen (14) one inch cuts per hour.

(2) Welding equipment with a maximum capacity of 56 pounds of weld wire per hour, 1,845 parts welded per hour, and 9,542 pounds of finished material per hour.

(3) Four (4) aluminum welding stations, installed in 2017, each with a maximum capacity of 4.21 pounds of weld wire per hour.

(b) Natural gas-fired combustion sources with heat input equal or less than ten million (10,000,000) Btu per hour, including:

(1) One (1) curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers, heat input capacity: 0.67 million British thermal units per hour.

(2) One (1) make-up air heater with a heat input capacity of 7.86 million British thermal units per hour.

(c) One (1) wood burning heater, installed in October 2005, used for comfort heating for the employees, heat input capacity: 0.65 million British thermal units per hour.

(a) Combustion related activities, including:

(1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, as follows.
(i) One (1) natural gas-fired curing area, included in EU-06A, with a maximum heat input capacity of 0.67 MMBtu/hr, exhausting to stacks S-1 and S-2.

(ii) One (1) natural gas-fired air makeup air heater for EU-01A, identified as EU-06A, with a maximum heat input capacity of 7.86 MMBtu/hr, exhausting to stacks S-1 and S-2.

(iii) One (1) natural gas-fired air makeup heater for EU-05, identified as EU-06B, permitted in 2019, with a maximum heat input capacity of 1.90 MMBtu/hr, exhausting to stacks S-3 and S-4.

(B) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning treated wood or chemically contaminated wood, as follows:

(i) One (1) wood burning heater for comfort heating, identified as EU-07, installed in October 2005, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack S-5.

(2) Combustion source flame safety purging on startup.

(b) Fuel dispensing activities, including:

(1) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, as follows:

(A) One (1) diesel fuel storage tank, identified as EU-11, constructed in 1995, permitted in 2019, with a maximum capacity of 300 gallons.

(c) Production related activities, constructed in 1998, exhausting indoors, including the following:

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(A) Cutting torches, identified as EU-09, with a maximum capacity of fourteen (14) cuts one (1) inch or less in length in stock one (1) inch in thickness or less per hour.

(B) Welding equipment, identified as EU-08, as follows:

(i) Four (4) steel MIG welding stations, with a maximum capacity of 56 pounds of wire per hour, each.

(ii) One (1) aluminum MIG welding station, with a maximum capacity of 4.21 pounds of wire per hour.

(d) Paved and unpaved roads and parking lots with public access, identified as EU-12.

(e) 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 three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic
feet per minute as follows:

(1) Woodworking operations, constructed in 1995, permitted in 2019, as follows:

(A) Three (3) table saws, identified as EU-10, controlled by a filter bag with a maximum flow rate of 1,500 acfm, exhausting indoors.

(f) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

- For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
- For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
- For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
- For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
- For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
- For PM_{10} or direct PM_{2.5}, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

As follows:

(1) Two (2) wood-cutting chop saws, included in EU-10, permitted in 2019, using no controls.

(2) Activities performed using hand-held equipment, consisting of:

(A) Grinding, as follows:

(i) Hand-held grinding to prepare trailer frame welds for painting, identified as EU-13, constructed in 1995, permitted in 2019.

(B) Sawing, as follows:

(i) Two (2) wood cutting circular saws, included in EU-10, permitted in 2019.

...
(b) One (1) undercoating spray application process, identified as EU-02 and formerly part of the one (1) general assembly area, constructed in 1998, using HLVP spray applicators, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour and 165 metal cargo trailers per day. One (1) undercoating and touchup spray application process, identified as EU-02, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour and 165 metal cargo trailers per day, using non-atomizing HLVP spray applicators for undercoating and touchup and aerosol cans for touchup, exhausting indoors.

(c) One (1) plywood wall adhesive spray application process, identified as EU-03 and formerly part of the one (1) general assembly area, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, capacity: the plywood walls of 15.0 metal cargo trailers per hour One (1) adhesive spray application process, identified as EU-03, constructed in 1998, approved in 2019 for modification, with a maximum capacity of parts for 15 metal cargo trailers per hour, using non-atomizing HVLP spray applicators, exhausting indoors.

(d) One (1) general assembly area, identified as EU-04, using hand, brush, or caulk gun application methods, constructed in 1998, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour. One (1) general assembly area, identified as EU-04, constructed in 1998, approved in 2019 for modification, with a maximum capacity of 15 metal cargo trailers per hour, using hand, brush, or caulk gun application methods, exhausting indoors.

(e) One (1) paint station, identified as EU-05, approved in 2019 for construction, with a maximum capacity of 15 metal cargo trailers per hour, using dry filters as control, and exhausting to stacks S-3 and S-4.

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

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

D.1.1 Hazardous Air Pollutants (HAPs) Minor Limitations [326 IAC 2-8-4][326 IAC 2-4.1][40 CFR 63]

(a) The amount of each individual HAP used at the general assembly area, identified as EU-04, shall be limited to less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The amount of any combination of HAPs used at the general assembly area, identified as EU-04, shall be limited to less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) Toluene input to the paint stations EU-01A and EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Methanol input to the undercoating and touchup spray application process EU-02, and assembly process EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Methylene chloride input to the adhesive spray application process, EU-03, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Ethylene glycol input to the assembly process, EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) Xylenes input to paint station EU-01A, undercoating and touchup spray application process EU-02, assembly process EU-04, and paint station EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(f) The combined input of ethylene glycol, methanol, methylene chloride, toluene, and xylenes to paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05 shall not exceed a total of 19.66 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit each single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit combined HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of
the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.23 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators at the paint station, identified as EU-01A, and the general assembly area, identified as EU-04, metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis when coating metal the Permittee shall not allow discharge into the atmosphere from the surface coating operations, identified as paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05, VOC in excess of 3.5 pounds of VOCs per gallon of coating, excluding water, as delivered to the applicator.

D.1.34 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements Work Practices [326 IAC 8-2-9]

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

(1a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.45 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint station, identified as EU-01A, and the plywood wall adhesive spray application process, identified as EU-03, paint station EU-01A and paint station EU-05 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

D.1.5 Prevention of Significant Deterioration (PSD) PM Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2, PSD, the PM emissions from the paint station, identified as EU-01A, and the plywood wall spray adhesive application process, identified as EU-03, shall be limited as follows:

(a) The coatings applied by the paint station, identified as EU-01A shall be limited such that the total PM emissions shall not exceed 85.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) The transfer efficiency at the paint station, identified as EU-01A, for the gun used to paint shall not be less than 75% and the transfer efficiency of the gun used for the undercoating shall not be less than 65%.
(2) The control efficiency of the dry filters shall not be less than 96%.

(b) The coatings applied by the plywood adhesive spray application process, identified as EU-03, shall be limited such that the total PM emissions shall not exceed 1.80 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The transfer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 25%.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

D.1.6 Particulate Matter (PM$_{10}$ and PM$_{2.5}$) [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-2, PSD, and 326 IAC 2-8-4, the PM$_{10}$ and PM$_{2.5}$ emissions from the paint station, identified as EU-01 A, and the plywood wall spray adhesive application process, identified as EU-03, shall be limited as follows:

(a) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM$_{10}$ and PM$_{2.5}$ emissions shall not exceed 85.0 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

(1) The transfer efficiency at the paint station, identified as EU-01 A, for the gun used to paint shall not be less than 75% and the transfer efficiency of the gun used for the undercoating shall not be less than 65%.

(2) The control efficiency of the dry filters shall not be less than 96%.

(b) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM$_{10}$ and PM$_{2.5}$ emissions shall not exceed 1.80 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

The transfer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 25%.

Compliance with these limitations in combination with the unrestricted potential emissions from the undercoating spray application process, identified as EU-02, and from insignificant activities, shall limit the source-wide total potential to emit of PM$_{10}$ and PM$_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable.

D.1.7 Volatile Organic Compounds [326 IAC 2-2] [326 IAC 2-8-4]

The use of VOC, including coatings, dilution solvents, and cleaning solvents at the paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, shall be less than 99.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limitation shall limit the source-wide potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, rendering 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the paint booth, identified as EU-01 A, and the plywood wall adhesive spray application process, identified as EU-03, and their dry particulate
filters these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.97 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

In order to ensure compliance with the requirements of 326 IAC 8-2-9 in Condition D.1.2, volume weighted averaging of all coatings used per day will be required. The daily volume weighted average of VOC content from the paint station, identified as EU-01A, and the general assembly area, identified as EU-04, shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

\[
A = \left[ \frac{\sum (C x U)}{\sum U} \right]
\]

Where:

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

The daily volume weighted average of VOC content from the paint station (EU-01), undercoating and touchup process (EU-02), assembly process (EU-04), and paint station (EU-05) shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water.

D.1.10 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4(a)]

Compliance with the HAPs and VOC VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.11 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-2] [326 IAC 2-8-4]

Compliance with Conditions D.1.5 and D.1.6 shall be determined by calculating the PM/PM10/PM2.5 emissions associated with each coating applied in the paint station, identified as EU-01A, using the following equation:

\[
\text{PM/PM10/PM2.5} = \frac{\sum (C x D x W x S) x (1-TE/100) x (1-CE/100) x 1/2000}{\sum U}
\]
Where:

- **PM/PM10/PM2.5** = The total PM/PM10/PM2.5 emissions in tons per month for a given coating.
- **CU** = The total coating use of a given coating (gallons of a coating per month).
- **D** = Density of a given coating (pounds of coating per gallon of coating).
- **W%S** = Weight percent solids of a given coating (pounds of solids per pound of coating).
- **TE** = Transfer efficiency (%) of the spray applicators.
- **CE** = Control efficiency (%) of the dry filters.

<table>
<thead>
<tr>
<th>Unit</th>
<th>Transfer Efficiency</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-01A Paint</td>
<td>75%</td>
<td>96%</td>
</tr>
<tr>
<td>EU-01A Undercoating</td>
<td>65%</td>
<td>96%</td>
</tr>
</tbody>
</table>

Compliance with the coatings in the plywood wall adhesive spray application process, identified as EU-03, shall be determined using the following equation:

\[
PM/PM10/PM2.5 = \left( \sum CU \times D \times W\%S \right) \times \left( 1 - \frac{TE}{100} \right) \times \frac{1}{2000}
\]

Where:

- **PM/PM10/PM2.5** = The total PM/PM10/PM2.5 emissions in tons per month for a given coating.
- **CU** = The total coating use of a given coating (gallons of a coating per month).
- **D** = Density of a given coating (pounds of coating per gallon of coating).
- **W%S** = Weight percent solids of a given coating (pounds of solids per pound of coating).
- **TE** = Transfer efficiency (%) of the spray applicators. This value shall equal 25%.

### D.1.9 Hazardous Air Pollutants (HAP) Emissions

(a) In order to demonstrate compliance with Condition D.1.2(a), the Permittee shall determine toluene input for EU-01A and EU-05 according to the following formula:

\[
E_T = \frac{\left[ (G_{1A} + G_5) \times T_C \right] + \left[ (S_{1A} + S_5) \times T_S \right]}{2,000 \text{ lb/ton}}
\]

Where

- \( E_T \) = Monthly toluene emissions, tons/month
- \( G_{1A} \) = Monthly Z Shield 7800 HG usage in EU-01A, gal/month
- \( G_5 \) = Monthly Z Shield 7800 HG usage in EU-05, gal/month
- \( T_C \) = Toluene emission factor for Z Shield 7800 HG, lb/gal
In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall determine methanol input for EU-02 and EU-04 according to the following formula:

\[ E_{\text{MA}} = \frac{U_T \times M_A + (A_4 \times M_{AA}) + (S_4 \times M_{AS})}{2,000 \text{ lb/ton}} \]

Where:
- \( E_{\text{MA}} \) = Monthly methanol emissions, tons/month
- \( U_T \) = Monthly aerosol touchup undercoating usage in EU-02, gal/month
- \( M_A \) = Methanol emission factor for undercoating touchup, lb/gal
- \( A_4 \) = Monthly total adhesive usage in EU-04, gal/month
- \( M_{AA} \) = Methanol emission factor for sealants, lb/gal
- \( S_4 \) = Monthly total sealant usage in EU-04, gal/month
- \( M_{AS} \) = Methanol emission factor for sealants, lb/gal

In order to demonstrate compliance with Condition D.1.2(c), the Permittee shall determine methylene chloride input for EU-03 according to the following formula:

\[ E_{\text{MC}} = \frac{A_3 \times M_C}{2,000 \text{ lb/ton}} \]

Where:
- \( E_{\text{MC}} \) = Monthly methylene chloride emissions, tons/month
- \( A_3 \) = Monthly PB925 adhesive usage in EU-03, gal/month
- \( M_C \) = Methylene chloride emission factor for adhesive PB925, lb/gal

In order to demonstrate compliance with Condition D.1.2(d), the Permittee shall determine ethylene glycol input for EU-04 according to the following formula:

\[ E_E = \frac{S_4 \times E_{\text{AS}}}{2,000 \text{ lb/ton}} \]

Where:
- \( E_E \) = Monthly ethylene glycol emissions, tons/month
- \( S_4 \) = Monthly total sealant usage in EU-04, gal/month
- \( E_{\text{AS}} \) = Ethylene glycol emission factor for sealants, lb/gal

In order to demonstrate compliance with Condition D.1.2(e) the Permittee shall determine xylenes input according to the following formula:

\[ E_X = \frac{[(G_{1A} + G_5) \times X_C] + [(S_{1A} + S_5) \times X_s] + (U \times X_U) + (S_4 \times X_{\text{AS}})}{2,000 \text{ lb/ton}} \]

Where:
- \( E_X \) = Monthly xylenes emissions, tons/month
- \( G_{1A} \) = Monthly Z Shield 7800 HG usage in EU-01A, gal/month
- \( G_5 \) = Monthly Z Shield 7800 HG usage in EU-05, gal/month
- \( X_C \) = Xylenes emission factor for Z Shield 7800 HG, lb/gal
- \( S_{1A} \) = Monthly gun cleaning solvent usage in EU-01A, gal/month
- \( S_5 \) = Monthly gun cleaning solvent usage in EU-05, gal/month
- \( X_s \) = Xylenes emission factor for gun cleaning solvent, lb/gal
- \( U \) = Monthly undercoating usage in EU-02, gal/month
- \( X_U \) = Xylenes emission factor for undercoating, lb/gal
- \( S_4 \) = Monthly total sealant usage in EU-04, gal/month
- \( X_{\text{AS}} \) = Xylenes emission factor for sealants, lb/gal

In order to demonstrate compliance with Condition D.1.2(f) the Permittee shall...
determine combined HAP input according to the following formula:

\[ E_C = E_T + E_{MA} + E_{MC} + E_E + E_X \]

Where
- \( E_C \) = Monthly combined HAP emissions, tons/month
- \( E_T \) = Monthly toluene emissions, tons/month
- \( E_{MA} \) = Monthly methanol emissions, tons/month
- \( E_{MC} \) = Monthly methylene chloride emissions, tons/month
- \( E_E \) = Monthly ethylene glycol emissions, tons/month
- \( E_X \) = Monthly xylenes emissions, tons/month

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

D.1.4210 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 S-1 and S-2 while one or more of the booths are paint station EU-01A stacks S-1 and S-2 while the unit is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the Stacks S-1 and S-2 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(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, weekly observations shall be made of the overspray from the paint station EU-05 stacks S-3 and S-4 while the unit is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(d) Monthly inspections shall be performed of the coating emissions from stacks S-3 and S-4 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.4311 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.2 and D.1.7, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs and VOC usage limits established in Conditions
D.1.1 and D.1.7. **D.1.2.** Records necessary to demonstrate compliance shall be available no later than thirty (30) days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used, less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC, single HAP, and combination of all HAPs ethylene glycol, methanol, methylene chloride, toluene, xylenes, and combined HAPs usage for each month.

(5) The weight of VOCs emitted total VOC, ethylene glycol, methanol, methylene chloride, toluene, xylenes, and combined HAPs usage for each compliance period.

(b) To document the compliance status with Condition D.1.23, 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 emission limits established in Condition D.1.23. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted average VOC content less water of the coatings used for each day;

(4) The cleanup solvent usage for each day;

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

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

(c) To document the compliance status with Conditions D.1.5 and D.1.6 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM, PM10 and PM2.5 emission limits established in Conditions D.1.5 and D.1.6.
(1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(3) Calculations as determined by Condition D.1.11.

(d) To document the compliance status with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.

(e) ...

D.1.412 Reporting Requirements

A quarterly report of VOC, toluene, methanol, methylene chloride, ethylene glycol, xylenes, and combined HAP emissions and a quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.5, D.1.6, and D.1.7 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

((a) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Cutting torches with a maximum capacity of fourteen (14) one inch cuts per hour.

(2) Welding equipment with a maximum capacity of 56 pounds of weld wire per hour, 1,845 parts welded per hour, and 9,542 pounds of finished material per hour.

(e) 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 three one hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute as follows:

(1) Woodworking operations, constructed in 1995, permitted in 2019, as follows:

(A) Three (3) table saws, identified as EU-10, controlled by a filter bag with a maximum flow rate of 1,500 acfm, exhausting indoors.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant welding operations shall not exceed 11.7 pounds per hour when operating at a process weight rate of less than 9,598 pounds per hour.

The pounds per hour limitation was calculated using the following equation:
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 4.10 P^{0.67} \]

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

D.2.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.2 Particulate Control

In order to assure that the table saws (EU-10) are not subject to the requirements of 326 IAC 6-3-2, the integral filter bag for particulate control shall be in operation and control emissions from the table saws (EU-10) at all times the table saws (EU-10) are in operation.

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

D.2.3 Filter Inspections

The Permittee shall perform semi-annual inspections of the bag filter controlling particulate emissions from the table saws (EU-10) to verify that it is being operated and maintained in accordance with the manufacturer’s specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

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

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.3.

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Combustion related activities, including:

(1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:

(B) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning treated wood or chemically contaminated wood, as follows:
(i) One (1) wood burning heater for comfort heating, identified as EU-07, installed in October 2005, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack S-5.

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

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

D.3.1 Type of Wood Used [326 IAC 4-2]

In order to render the requirements of 326 IAC 4-2 (Incinerators) not applicable, the Permittee shall burn only clean wood in heater EU-07.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromated copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board and oriented strand board).

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.3.3 Wood Inspections

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform visual inspections of all wood received at heater EU-07 for combustion at the time of delivery to collection area. Inspections shall be conducted by trained plant personnel. The inspections shall be conducted to ensure that the material being fed to heater EU-07 does not contain any of the following material:

(a) Treated, painted or coated wood-based material; or

(b) Non-wood material (i.e., plastic, fiberglass, metal, rubber, etc.)

Any materials listed above shall be rejected and discarded.

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

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.3, the Permittee shall maintain records on a daily basis of all visual wood inspections, and the results of each inspection. The records shall include the date of inspection and name of person performing the inspection. The Permittee shall include in its daily record when inspections are not made for the day and the reason for the lack of inspections, (e.g. heater EU-07 was not in operation or did not receive any loads to the collection area that day).

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ...

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ...

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ...

Facility: General assembly area, identified as EU-04 Paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05

Parameter: Individual HAP usage VOC input

Limit: Less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period, with compliance determination at the end of each month. The combined input of VOC to paint station EU-01A, undercoating and touchup spray application process EU-02, adhesive spray application process EU-03, assembly process EU-04, and paint station EU-05 shall not exceed a total of 95.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ... General assembly area, identified as EU-04 Paint stations EU-01A and EU-05 Parameter: Combination of all HAP usage Toluene input
Limit: Less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period, with compliance determination at the end of each month Toluene input to the paint stations EU-01A and EU-05 shall not exceed a combined total of 9.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ... Paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04 Paint station, identified as EU-01A Undercoating and touchup spray application process EU-02, and assembly process EU-04 Parameter: VOC usage Methanol input
Limit: Less than ninety-nine and seven-tenths (99.7) tons per twelve (12) consecutive month period, with compliance determination at the end of each month Methanol input to the undercoating and touchup spray application process EU-02, and assembly process EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ... Paint Station, identified as EU-01A Adhesive spray application process EU-03 Parameter: PM Emissions Methylene chloride input
Limit: Less than eighty-five (85.0) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11) Methylene chloride input to the adhesive spray application process, EU-03, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ...
Facility: Paint Station, identified as EU-01A Assembly process EU-04, PM₁₀ and PM₂.₅ Emissions Ethylene glycol input
Parameter: Limit: Less than eighty-five (85.0) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11) Ethylene glycol input to the assembly process, EU-04, shall not exceed 9.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...
calculated by Condition D.1.11) The combined input of ethylene glycol, methylene chloride, toluene, and xylene to paint station EU-01A, undercoating and touchup spray application process EU-02, the adhesive spray application process EU-03, the assembly process EU-04, and paint station EU-05 shall not exceed a total of 9.71 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Source Name: Haulmark Trailers of IN, Inc.
Source Address: ...

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 6, 2019.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 039-41420-00254. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Doug Logan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Appendix A: Emission Calculations

**PTE Summary**

**Company Name:** Haulmark Trailers of IN, Inc.  
**Source Address:** 14054 CR 4 East, Bristol, IN 46507  
**SPR No.:** 039-41420-00254  
**Reviewer:** Doug Logan  
**Date:** 9/23/2019

#### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<td>Paint Station (EU-01A)</td>
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<td>99.16</td>
<td>99.16</td>
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<td>433.76</td>
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<td>Paint Station (EU-05)</td>
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<td>99.16</td>
<td>99.16</td>
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<td>Natural gas combustion (EU-06A &amp; EU-06B)</td>
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<td>0.34</td>
<td>0.34</td>
<td>2.69E-02</td>
<td>4.48</td>
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<td>3.76</td>
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<tr>
<td>Wood waste combustion (EU-07)</td>
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<td>7.12E-02</td>
<td>1.40</td>
<td>4.84E-02</td>
<td>1.71</td>
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<tr>
<td>Welding and cutting (EU-08 &amp; EU-09)</td>
<td>6.54</td>
<td>6.54</td>
<td>6.54</td>
<td>-</td>
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<td>-</td>
</tr>
<tr>
<td>Wood saws (EU-10)</td>
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<td>4.05</td>
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<td>Diesel fuel dispensing (EU-11)</td>
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<td>-</td>
<td>-</td>
<td>2.15E-02</td>
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<tr>
<td>Grinding (EU-13)</td>
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<td>5.00E-03</td>
<td>5.00E-03</td>
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<td>-</td>
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<tr>
<td><strong>Total</strong></td>
<td>210.15</td>
<td>210.34</td>
<td>210.20</td>
<td>9.80E-02</td>
<td>5.87</td>
<td>1,025.71</td>
<td>5.47</td>
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</tbody>
</table>

**Fugitive Emissions**

- **Paved Roads (EU-12)**: 2.54 0.51 0.12

**Notes:**
1. **PM<sub>2.5</sub>** listed is direct PM<sub>2.5</sub>
2. Source is not in one of the 28 source categories at 326 IAC 2-2-1(ff)(1) and is not subject to NSPS or NESHAP that were in effect before August 7, 1980. Therefore, fugitives are not considered in determining Part 70 or PSD applicability.

#### Potential to Emit after Issuance<sup>1,2</sup> (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Station (EU-01A)</td>
<td>4.96</td>
<td>4.96</td>
<td>4.96</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Paint booth (EU-05)</td>
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<td>4.96</td>
<td>4.96</td>
<td>-</td>
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<tr>
<td>Undercoating (EU-02)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Adhesive spray (EU-03)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Assembly area (EU-04)</td>
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<td>-</td>
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<td>-</td>
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<td>-</td>
</tr>
<tr>
<td>Natural gas combustion (EU-06A &amp; EU-06B)</td>
<td>8.51E-02</td>
<td>0.34</td>
<td>0.34</td>
<td>2.69E-02</td>
<td>4.48</td>
<td>0.25</td>
<td>3.76</td>
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<tr>
<td>Wood waste combustion (EU-07)</td>
<td>1.14</td>
<td>1.07</td>
<td>0.93</td>
<td>7.12E-02</td>
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<td>4.84E-02</td>
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<tr>
<td>Welding and cutting (EU-08 &amp; EU-09)</td>
<td>6.54</td>
<td>6.54</td>
<td>6.54</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Wood saws (EU-10)</td>
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<td>4.05</td>
<td>4.05</td>
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<td>Diesel fuel dispensing (EU-11)</td>
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<td>2.15E-02</td>
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<tr>
<td>Grinding (EU-13)</td>
<td>5.00E-03</td>
<td>5.00E-03</td>
<td>5.00E-03</td>
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<td>-</td>
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<tr>
<td><strong>Total</strong></td>
<td>21.74</td>
<td>21.93</td>
<td>21.79</td>
<td>0.10</td>
<td>5.87</td>
<td>95.32</td>
<td>5.47</td>
</tr>
</tbody>
</table>

**Notes:**
1. The shaded cells indicate where limits are included.
2. Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the surface coating operations to the values shown.
3. **PM<sub>2.5</sub>** listed is direct PM<sub>2.5</sub>
## Appendix A: Emission Calculations

**HAP Summary**

**Company Name:** Haulmark Trailers of IN, Inc.

**Source Address:** 14054 CR 4 East, Bristol, IN 46507

**SPR No.:** 039-41420-00254

**Reviewer:** Doug Logan

**Date:** 9/23/2019

### Uncontrolled Potential to Emit (tons/yr)

**Emission Unit** | EU-01A | EU-02 | EU-03 | EU-04 | EU-05 | Natural Gas Combustion | Wood Combustion | Welding & Cutting | Diesel Dispensing | Combined |
<table>
<thead>
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<th></th>
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</thead>
<tbody>
<tr>
<td><strong>Organic HAPs</strong></td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>Acetaldehyde</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.57E-03</td>
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<td>-</td>
<td>2.36E-03</td>
<td>3.93E-03</td>
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<tr>
<td>Acrolein</td>
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<td>-</td>
<td>-</td>
<td>6.27E-05</td>
<td>9.96E-04</td>
<td>-</td>
<td>1.06E-03</td>
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</tr>
<tr>
<td>Chromium</td>
<td>-</td>
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<td>-</td>
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<td>2.24E-05</td>
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<tr>
<td>Hydrogen chloride</td>
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<td>1.70E-05</td>
<td>4.56E-03</td>
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<td>0.32</td>
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<tr>
<td>Lead</td>
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<td>-</td>
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<tr>
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### Potential to Emit After Issuance (tons/yr)

**Emission Unit** | EU-01A | EU-02 | EU-03 | EU-04 | EU-05 | Natural Gas Combustion | Wood Combustion | Welding & Cutting | Diesel Dispensing | Combined |
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</tr>
<tr>
<td>Acetaldehyde</td>
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<td>-</td>
<td>9.96</td>
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<tr>
<td>Methylene Chloride</td>
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<td>Naphthalene</td>
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<td><strong>Inorganic HAPs</strong></td>
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<tr>
<td>Cadmium</td>
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<tr>
<td>Chromium</td>
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<td>-</td>
<td>-</td>
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<td>-</td>
<td>2.24E-05</td>
<td>-</td>
<td>-</td>
<td>2.24E-05</td>
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</tr>
<tr>
<td>Hydrogen chloride</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.70E-05</td>
<td>4.56E-03</td>
<td>0.31</td>
<td>0.32</td>
<td></td>
</tr>
<tr>
<td>Lead</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>9.41E-05</td>
<td>9.87E-04</td>
<td>-</td>
<td>9.87E-04</td>
<td></td>
</tr>
<tr>
<td>Nickel</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>4.93E-05</td>
<td>-</td>
<td>-</td>
<td>4.93E-05</td>
<td></td>
</tr>
<tr>
<td><strong>Total Emissions</strong></td>
<td>24.00</td>
<td>8.45E-02</td>
<td>0.10</td>
<td>0.31</td>
<td>1.79E-03</td>
<td>24.50</td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Notes:**

1. Shaded cells indicate where limits are included in the permit.
Appendix A: Emission Calculations

SPR Summary

Company Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, IN 46507
SPR No.: 039-41420-00254
Reviewer: Doug Logan
Date: 9/23/2019

<table>
<thead>
<tr>
<th>Uncontrolled Potential to Emit of the New Units (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>Paint Station (EU-05)</td>
</tr>
<tr>
<td>Make-up air heater (EU-06B)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

Notes:
1. Source-wide highest single HAP, methylene chloride

<table>
<thead>
<tr>
<th>PTE of the Modified Emission Units Before This Revision (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process/Emission Unit</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>EU-01A</td>
</tr>
<tr>
<td>EU-02</td>
</tr>
<tr>
<td>EU-03</td>
</tr>
<tr>
<td>EU-04</td>
</tr>
<tr>
<td>EU-08 &amp; EU-09</td>
</tr>
</tbody>
</table>

Notes:
1. Source: TSD App A, FESOP Renewal No. 039-37790-00254, issued July 5, 2017 which did not provide uncontrolled PTE of EU-04, taken as 0 for all pollutants
2. Source-wide highest single HAP, methylene chloride

<table>
<thead>
<tr>
<th>PTE of the Modified Emission Units After This Revision (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process/Emission Unit</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>EU-01A</td>
</tr>
<tr>
<td>EU-02</td>
</tr>
<tr>
<td>EU-03</td>
</tr>
<tr>
<td>EU-04</td>
</tr>
<tr>
<td>EU-08 &amp; EU-09</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PTE Increase of the Modified Emission Units After This Revision (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process/Emission Unit</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>EU-01A</td>
</tr>
<tr>
<td>EU-02</td>
</tr>
<tr>
<td>EU-03</td>
</tr>
<tr>
<td>EU-04</td>
</tr>
<tr>
<td>EU-08 &amp; EU-09</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the Modified Emission Units</strong></td>
</tr>
</tbody>
</table>

Methodology

PTE Increase = Greater of 0 or (PTE After - PTE Before)

<table>
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<tr>
<th>PTE Increases Due to this Amendment (ton/year)</th>
</tr>
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<tbody>
<tr>
<td>Process/Emission Unit</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Unit(s)/Process</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Unit</td>
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</table>
Appendix A: Emissions Calculations
From Surface Coating Operations

Company Name: Haulmark Trailers of IN, Inc.
Company Address: 14054 CR 4 East, Bristol, IN 46507
SPR #: 248-1421-00025
Date: 09/23/2019

1. VOC and PM

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Weight % Organics</th>
<th>Volume % Water &amp; Exempts</th>
<th>Gel of Max</th>
<th>Pounds VOC per Gallon of Coatings/substrate (uncontrolled)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential to Emit VOC</th>
<th>Potential to Emit Particulate</th>
<th>Gallons of Coating</th>
<th>Application Method</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Z Tech</td>
<td>Z Shield 7800 HG</td>
<td>7.59</td>
<td>57.00%</td>
<td>11.00%</td>
<td>46.00%</td>
<td>12.64%</td>
<td>1.83</td>
<td>15</td>
<td>4.00</td>
<td>3.49</td>
<td>56.88</td>
<td>2225.08</td>
<td>434.33</td>
<td>98.16</td>
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<td>Cobra HP, A-side</td>
<td>0.61</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Ultimate Linings LLC</td>
<td>Cobra HP, B-side</td>
<td>0.73</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>gun cleaning</td>
<td>(assumed VM &amp; P naphtha)</td>
<td>7.18</td>
<td>100%</td>
<td>0%</td>
<td>100%</td>
<td>0%</td>
<td>0.020</td>
<td>15</td>
<td>7.18</td>
<td>7.18</td>
<td>2.15</td>
<td>51.70</td>
<td>9.43</td>
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</tr>
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<td>Z Tech</td>
<td>Z Guard 20060B-DUT</td>
<td>11.80</td>
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<td>13.10%</td>
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<td>0.0200</td>
<td>15</td>
<td>1.64</td>
<td>1.52</td>
<td>0.46</td>
<td>10.04</td>
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<td>Dupli-Color</td>
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<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>-</td>
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<tr>
<td>Ultimate Linings LLC</td>
<td>Cobra HP, B-side</td>
<td>0.73</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
<td>15</td>
<td>0</td>
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<td>0</td>
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<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Ultimate Linings LLC</td>
<td>Cobra HP, A-side</td>
<td>0.61</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Ultimate Linings LLC</td>
<td>Cobra HP, B-side</td>
<td>0.73</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1.296</td>
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<td>0</td>
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<td>0</td>
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<table>
<thead>
<tr>
<th>Application</th>
<th>Method</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
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<td>airless or HVLP</td>
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<td>100% Metal</td>
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<tr>
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<td>-</td>
<td>Metal</td>
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</table>

Notes:
1. IDEM, OAQ has determined that application of PB925 adhesive, Cobra HP topcoat, and Z Guard 20060B-DUT undercoating in trailer assembly operations at this source when using non-atomizing spray does not generate particulate emissions. Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.
2. Source has not provided usage details for undercoat touchup. IDEM, OAQ has made a conservative assumption that undercoating touchup requires 10% of the solids delivered by the primary undercoating process.

METHODOLOGY

Pounds VOC per Gallon Coatings less Water + (Density (lb/gal) * Weight % Organics) / (Volume % solids)

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

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

Potential VOC Tons per Year = Potential VOC Pounds per Day * 8,760 hours/yr / 2,000 lbs/ton

Notes:
1. IDEM, OAQ has determined that application of PB925 adhesive, Cobra HP topcoat, and Z Guard 20060B-DUT undercoating in trailer assembly operations at this source when using non-atomizing spray does not generate particulate emissions. Therefore, this adhesive operation does not meet the definition of "surface coating" under 226 IAC 8-3-5 and is not subject to the requirements of 226 IAC 8-3-5.
2. Source has not provided usage details for undercoat touchup. IDEM, OAQ has made a conservative assumption that undercoating touchup requires 10% of the solids delivered by the primary undercoating process.
### 3. Hazardous Air Pollutants

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<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat.</th>
<th>Maximum Weight %</th>
<th>HAP PTE (tons/yr)</th>
<th>HAP Weight Percent (%)</th>
<th>Compliance Determination Factor</th>
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<tbody>
<tr>
<td>MeCl₂</td>
<td>7.99</td>
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<td>15%</td>
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<td>0%</td>
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<td>Ethylene Glycol (EG)</td>
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<td>15%</td>
<td>0%</td>
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<td>0%</td>
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<td>Cumene</td>
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<td>0%</td>
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<td>Acetaldehyde</td>
<td>1.76</td>
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<td>15%</td>
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<td>0%</td>
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<td>Formaldehyde</td>
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<td>Stoddard Solvent</td>
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<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>VM &amp; P naphtha</td>
<td>7.18</td>
<td>3.00%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

#### Notes:
1. EG - ethylene glycol, assumes that all of the compound present in the product evaporates.
2. MeCl₂ - methylene chloride
3. HAP content for mineral spirits blend named in SDS, and default HAP content from Table 3 to Subpart MMMM of 40 CFR 63
4. Cleaning solvent assumed ethylene glycol for comparability with coatings
5. HAP content for Standard Solvent, blend named in SDS, and default HAP content from Table 3 to Subpart MMMM of 40 CFR 63
6. HAP content for Mineral Spirits (CASRN 64742-88-7), named in SDS as middle aliphatic hydrocarbon solvent, from Table 3 to Subpart MMMM of 40 CFR 63.
7. HAP content for residual spirits blend named in SDS, and default HAP content from Table 3 to Subpart MMMM of 40 CFR 63
8. HAP content for aromatic solvent (CASRN 64740-54-0), and aromatic naphtha (CASRN 64740-54-8) blends named in SDS, and default HAP content from Table 3 to Subpart MMMM of 40 CFR 63
9. The solvent blend hydrotreated middle petroleum distillates (CASRN 64742-46-7) is not listed in Table 3 to Subpart MMMM of 40 CFR 63, however HAP content is taken as zero consistent with other hydrotreated blends.
10. The solvent blend hydrotreated heavy naphthenic distillates (CASRN 64740-54-7) is not listed in Table 3 to Subpart MMMM of 40 CFR 63; however HAP content is taken as zero consistent with other hydrotreated blends. Methanol is not listed in section 3 of the SDS because the concentration is less than 1%; however the compound is identified in several entries in SDS section 15 and it is taken as a HAP at 1% concentration as a worst case.

### METHODOLOGY

HAP PTE (ton/yr) = Density (lb/gal) x Gal of Mat. (gal/unit) x Maximum Usage (unit/hr) x (Weight % HAP/100) x 8,760 (hr/yr) / 2,000 (lb/ton)

### Compliance Determination Factors

| HAP Product | Density (lb/gal) | HAP Wt. Percent | Compliance Determination Factor |
|-------------|-----------------|-----------------|---------------------------------
| MeCl₂       | 7.99            | 1.60            | 0%                              |
| EG          | 2.07            | 0.10            | 0%                              |
| Cumene      | 6.87            | 1.00            | 0%                              |
| Acetaldehyde| 1.76            | 1.00            | 0%                              |
| Formaldehyde| 2.07            | 0.10            | 0%                              |
| Methanol    | 7.18            | 3.00            | 0%                              |
| Stoddard Solvent | 7.18 | 3.00 | 0% |
| VM & P naphtha | 7.18 | 3.00 | 0% |
| Cleaning solvent | 7.18 | 3.00 | 0% |

### Notes:
1. Worst case density for assembly sealants
2. Worst case HAP content for assembly sealants
3. HAP weight percent includes the default HAP content of named solvent lends (e.g., VM & P naphtha) where such information is found in Table 3 and 4 to subpart MMMM of 40 CFR 63
4. Emissions is determined as the sum of emissions and the worst case of each of the four sealant products.

### Source:
HAP PTE (tons/yr) = Density (lb/gal) x Gal of Mat. (gal/unit) x Maximum Usage (unit/hr) x (Weight % HAP/100) x 8,760 (hr/yr) / 2,000 (lb/ton)
Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, IN 46507
SPR No.: 039-41420-00254
Reviewer: Doug Logan
Date: 9/23/2019

Capacity (MMBtu/hr)

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curing area</td>
<td>1</td>
<td>0.67</td>
<td>0.67</td>
</tr>
<tr>
<td>Make-up air heater</td>
<td>1</td>
<td>7.86</td>
<td>7.86</td>
</tr>
<tr>
<td>Make-up air heater (EU-06B)</td>
<td>1</td>
<td>1.90</td>
<td>1.90</td>
</tr>
</tbody>
</table>

10.43

HHV

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heat Input Capacity</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MMBtu/hr</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>mmBtu</td>
<td>10.43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>mmscf</td>
<td>1020</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Throughput</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MMCF/yr</td>
<td>89.6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Pollutant

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

*i see below

Potential Emission in tons/yr

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>8.51E-02</th>
<th>0.34</th>
<th>0.34</th>
<th>0.03</th>
<th>4.48</th>
<th>0.25</th>
<th>3.76</th>
</tr>
</thead>
</table>

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

HAPs - Organics

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>9.41E-05</td>
<td>5.37E-05</td>
<td>3.36E-03</td>
<td>8.06E-02</td>
<td>1.52E-04</td>
<td>8.43E-02</td>
</tr>
</tbody>
</table>

HAPs - Metals

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.24E-05</td>
<td>4.93E-05</td>
<td>6.27E-05</td>
<td>1.70E-05</td>
<td>9.41E-05</td>
<td>2.45E-04</td>
</tr>
</tbody>
</table>

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
### Appendix A: Emissions Calculations

#### Natural Gas Combustion Only

**MM BTU/HR <100**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Haulmark Trailers of IN, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>14054 CR 4 East, Bristol, IN 46507</td>
</tr>
<tr>
<td>SPR No.:</td>
<td>039-41420-00254</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Doug Logan</td>
</tr>
<tr>
<td>Date:</td>
<td>9/23/2019</td>
</tr>
</tbody>
</table>

This tab is for evaluating the PTE of the modification only, the unit is also included in the NG combustion tab.

#### Capacity (MMBtu/hr)

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Make-up air heater (EU-06B)</td>
<td>1</td>
<td>1.90</td>
<td>1.90</td>
</tr>
</tbody>
</table>

#### Heat Input Capacity

<table>
<thead>
<tr>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmscf</td>
</tr>
<tr>
<td>1.90</td>
<td>1020</td>
</tr>
</tbody>
</table>

#### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>1.55E-02</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.06</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.06</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.82</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.04</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.69</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.71E-05</td>
<td>9.79E-06</td>
<td>6.12E-04</td>
<td>1.47E-02</td>
<td>2.77E-05</td>
<td>1.54E-02</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>4.08E-06</td>
<td>8.97E-06</td>
<td>1.14E-05</td>
<td>3.10E-06</td>
<td>1.71E-05</td>
<td>4.47E-05</td>
</tr>
</tbody>
</table>

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
## Appendix A: Emissions Calculations
### External Combustion Boiler
#### Wood Waste Combustion
##### Dry Wood

**Company Name:**  Haulmark Trailers of IN, Inc.  
**Source Address:**  14054 CR 4 East, Bristol, IN  46507  
**SPR No.:**  039-41420-00254  
**Reviewer:**  Doug Logan  
**Date:**  9/23/2019

| Maximum Heat Input Capacity (MMBtu/hr) | 0.65 |

### Uncontrolled Potential to Emit

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Filterable PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMBtu (before control)**</td>
<td>0.40</td>
<td>0.377</td>
<td>0.327</td>
<td>0.025</td>
<td>0.49</td>
<td>0.017</td>
<td>0.60</td>
</tr>
<tr>
<td>Potential Emissions in tons/yr</td>
<td>1.14</td>
<td>1.07</td>
<td>0.93</td>
<td>0.07</td>
<td>1.40</td>
<td>0.05</td>
<td>1.71</td>
</tr>
</tbody>
</table>

### Methodology

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.  
*Based on AP 42 Chapter 1.6, the higher heating value of dry wood is 8000 Btu/lb.  
**Emission factors for combustion of dry wood are from AP 42 Tables 1.6-1, Table 1.6-2, and Table 1.6-3:  
PM10 emission factor (before control) include filterable PM10 (no control) and condensible PM (no control).  
PM2.5 emission factor (before control) include filterable PM2.5 (no control) and condensible PM (no control).  
CO emission factor for stokers and dutch ovens/fuel cells is 0.013 lb/MMBtu and for fluidized bed combustors is 0.17 lb/MMBtu.

To convert from tons/hr capacity to MMBtu/hr capacity:  
Maximum Heat Input Capacity (MMBtu/hr) = Maximum Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x 1 MMBtu/10^6 Btu x 2000 lbs/1 ton  
Potential Emissions (tons/yr) = Maximum Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760hrs/yr * 1 ton/2000lbs

### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Acetaldehyde</th>
<th>Acrolein</th>
<th>Benzene</th>
<th>Formaldehyde</th>
<th>Hydrogen Chloride</th>
<th>Styrene</th>
<th>Toluene</th>
<th>Manganese</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMBtu**</td>
<td>8.30E-04</td>
<td>4.00E-03</td>
<td>4.20E-03</td>
<td>4.40E-03</td>
<td>1.90E-02</td>
<td>1.90E-03</td>
<td>9.20E-02</td>
</tr>
<tr>
<td>Potential Emissions in tons/yr</td>
<td>2.36E-03</td>
<td>1.14E-02</td>
<td>1.20E-02</td>
<td>1.25E-02</td>
<td>5.41E-02</td>
<td>5.41E-02</td>
<td>2.62E-03</td>
</tr>
</tbody>
</table>

PTE of Total HAPs (tons/yr) = 0.10

### Methodology

*Based on AP 42 Chapter 1.6, the higher heating values of wood range between 4,500 Btu/lb of wet wood on a as-fired basis to 8,000 Btu/lb for dry wood.  
**Emission factors for combustion of wood are from AP 42 Tables 1.6-3 and 1.6-4:  
To convert from tons/hr capacity to MMBtu/hr capacity:  
Maximum Heat Input Capacity (MMBtu/hr) = Maximum Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10^6 Btu) x 2000 lbs/1 ton  
Potential Emissions (tons/yr) = Maximum Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760hrs/yr * 1 ton/2000lbs  
These factors include the eight HAPs with the highest AP-42 emission factors.
## Appendix A: Emissions Calculations

### Welding and Thermal Cutting

**Company Name:** Haulmark Trailers of IN, Inc.  
**Source Address:** 14054 CR 4 East, Bristol, IN 46507  
**SPR No.:** 039-41420-00254  
**Reviewer:** Doug Logan  
**Date:** 9/23/2019

### Emission Factors

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Stations</th>
<th>Maximum electrode consumption per station (lbs/hr)</th>
<th>Maximum electrode consumption per station (lbs/day)</th>
<th>Emission Factors* (lb pollutant/lb electrode)</th>
<th>Potential to Emit (lbs/hr)</th>
<th>HAPs (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal Inert Gas (MIG)(carbon steel, E70S)</td>
<td>4</td>
<td>56</td>
<td>1344</td>
<td>PMP/PM10/PM2.5 Mn Ni Cr</td>
<td>1.16</td>
<td>7.12E-02</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(aluminum)</td>
<td>1</td>
<td>4.21</td>
<td>101.04</td>
<td>PMP/PM10/PM2.5 Mn Ni Cr</td>
<td>0.33</td>
<td>7.12E-02</td>
</tr>
<tr>
<td>Oxyacetylene</td>
<td>1</td>
<td>1</td>
<td>0.23</td>
<td>PMP/PM10/PM2.5 Mn Ni Cr</td>
<td>0.1622</td>
<td>0.0005</td>
</tr>
</tbody>
</table>

**Totals**

<table>
<thead>
<tr>
<th>Potential to Emit (lbs/hr)</th>
<th>1.49</th>
<th>7.12E-02</th>
<th>2.25E-04</th>
<th>2.28E-04</th>
<th>7.17E-02</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential to Emit (lbs/day)</td>
<td>35.64</td>
<td>1.71</td>
<td>5.44E-03</td>
<td>5.48E-03</td>
<td>1.72</td>
</tr>
<tr>
<td>Potential to Emit (tons/year)</td>
<td>6.54</td>
<td>0.31</td>
<td>9.87E-04</td>
<td>9.99E-04</td>
<td>0.31</td>
</tr>
</tbody>
</table>

**Notes:**

1. Emission factors from Tables 12.19-1 and 12.19-2, AP-42 (1/95)
2. Emission factor for MIG welding with default aluminum wire from internal IDEM guidance

### Methodology:

**Cutting:** Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)

**Welding:** Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
Emissions, tons/yr = emissions, lbs/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
Appendix A: Emissions Calculations
Wood Saws (EU-10)

Company Name: Haulmark Trailers of IN, Inc.
Source Address: 14054 CR 4 East, Bristol, IN 46507
SPR No.: 039-41420-00254
Reviewer: Doug Logan
Date: 9/23/2019

1. **Three (3) table saws, controlled by a dust collector**

<table>
<thead>
<tr>
<th>Outlet Grain Loading (gr/dscf)</th>
<th>Exhaust Flow Rate (acfm)</th>
<th>Control Efficiency</th>
<th>Potential to Emit PM/PM_{10}/PM_{2.5} After Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.03</td>
<td>1500</td>
<td>95%</td>
<td>0.39 (lb/hr) 1.69 (tons/yr)</td>
</tr>
</tbody>
</table>

Notes:
1. Pursuant to the decision in Cause Nos. 92-A-J-730 and 92-A-J-833, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

**Methodology**

Emissions After Control (lb/hr) = Outlet Grain Loading (gr/dscf) x Exhaust Flow Rate (acfm) x 60 (min/hr) / 7,000 (gr/lb)

Uncontrolled PTE (lb/hr) = Emissions After Control (lb/hr) / [1 - Control Efficiency (%)/100]

PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)

assumes typical atmospheric conditions, acf = dscf

2. **Uncontrolled saws**

<table>
<thead>
<tr>
<th>Type</th>
<th>Number of Units</th>
<th>Uncontrolled PM/PM_{10}/PM_{2.5} Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Unit (lb/hr)</td>
</tr>
<tr>
<td>Chop saw</td>
<td>2</td>
<td>0.14</td>
</tr>
<tr>
<td>Circular saw</td>
<td>2</td>
<td>0.14</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Based on number and dimensions of cuts, density of white pine 26.5 lb/ft^{3}

**Methodology**

Potential to Emit (lb/hr) = Unit Emissions (lb/hr) x Number of Units

PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)

3. **Total of all Saws**

<table>
<thead>
<tr>
<th>Uncontrolled PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.05</td>
</tr>
</tbody>
</table>

**Methodology**

Sum of Section 1 and Section 2
A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less

1. VOC

Relationships for emissions from transportation and marketing of petroleum liquids in Chapter 5.2 of AP-42 are generally proportional to the vapor pressure (see eqn 1, sec. 5.2.2.1.1). Therefore, emission factors for gasoline dispensing may be multiplied by the ratio:

\[
\frac{\text{vapor pressure of diesel}}{\text{vapor pressure of gasoline}}
\]

to calculate emissions of diesel fuel dispensing operations.

The following emission factors for gasoline service station operations are from Table 5.2-7:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Emission Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Splash filling</td>
<td>11.5</td>
</tr>
<tr>
<td>Vehicle refueling displacement losses (uncontrolled)</td>
<td>11.0</td>
</tr>
<tr>
<td>Spillage</td>
<td>0.7</td>
</tr>
</tbody>
</table>

Total = 23.2 lb/10^3 gal throughput

From AP-42 Table 7.1-2

<table>
<thead>
<tr>
<th>Substance</th>
<th>CASRN</th>
<th>Weight Fraction of VOC</th>
<th>HAP PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>71-43-2</td>
<td>1.68E-03</td>
<td>3.61E-05</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>100-41-4</td>
<td>3.05E-03</td>
<td>6.56E-05</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>110-54-3</td>
<td>3.71E-04</td>
<td>7.98E-06</td>
</tr>
<tr>
<td>Toluene</td>
<td>108-88-3</td>
<td>2.16E-02</td>
<td>4.65E-04</td>
</tr>
<tr>
<td>Xylenes</td>
<td>1330-20-7</td>
<td>5.63E-02</td>
<td>1.21E-03</td>
</tr>
<tr>
<td>Combined</td>
<td></td>
<td></td>
<td>1.79E-03</td>
</tr>
</tbody>
</table>

Weight fractions of diesel species derived from Table 4, Chapter 19.4, Manual of Petroleum Measurement Standards, 3rd ed., API, October 2012

Then the worst-case PTE of diesel fueling operations defined as an insignificant activity in 326 IAC 2-7-1(21)(J)(ii)(BB) is

\[
\frac{3500 \text{ (gal/day)}}{1000 \text{ (gal/10^3 gal)}} \times \frac{23.2 \text{ (lb/10^3 gal)}}{0.009 \text{ (psia)}} \div \frac{6.2 \text{ (psia)}}{6.2 \text{ (psia)}} = 0.12 \text{ lb VOC/day} = 2.15E-02 \text{ tons/yr}
\]

2. Hazardous Air Pollutants

<table>
<thead>
<tr>
<th>HAP</th>
<th>CASRN</th>
<th>HAP as Weight Fraction of VOC</th>
<th>HAP PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>71-43-2</td>
<td>1.68E-03</td>
<td>3.61E-05</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>100-41-4</td>
<td>3.05E-03</td>
<td>6.56E-05</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>110-54-3</td>
<td>3.71E-04</td>
<td>7.98E-06</td>
</tr>
<tr>
<td>Toluene</td>
<td>108-88-3</td>
<td>2.16E-02</td>
<td>4.65E-04</td>
</tr>
<tr>
<td>Xylenes</td>
<td>1330-20-7</td>
<td>5.63E-02</td>
<td>1.21E-03</td>
</tr>
<tr>
<td>Combined</td>
<td></td>
<td></td>
<td>1.79E-03</td>
</tr>
</tbody>
</table>

Methodology

HAP PTE (tons/yr) = VOC PTE (tons/yr) x HAP as Weight Fraction of VOC
### Appendix A: Emission Calculations

#### Fugitive Dust Emissions - Paved Roads

**Company Name:** Haulmark Trailers of IN, Inc.  
**Source Address:** 14054 CR 4 East, Bristol, IN 46507  
**SPR No.:** 039-41420-00254  
**Reviewer:** Doug Logan  
**Date:** 9/23/2019

**Paved Roads at Industrial Site**

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

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day/vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (tons/day)</th>
<th>Maximum one-way distance (ft/trip)</th>
<th>Maximum one-way distance (miles/yr)</th>
<th>Maximum one-way miles (miles/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trailer movement</td>
<td>120.0</td>
<td>1.0</td>
<td>120.0</td>
<td>13.5</td>
<td>1820.0</td>
<td>500</td>
<td>0.095</td>
<td>11.4</td>
</tr>
<tr>
<td>Trucks, entering plant</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>13.5</td>
<td>67.5</td>
<td>500</td>
<td>0.095</td>
<td>5.5</td>
</tr>
<tr>
<td>Trucks, leaving plant</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>13.5</td>
<td>67.5</td>
<td>500</td>
<td>0.095</td>
<td>5.5</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>130.0</strong></td>
<td><strong>1755.0</strong></td>
<td><strong>12.3</strong></td>
<td><strong>4493.4</strong></td>
<td><strong>4963.4</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip** = 13.5 tons/trip

**Average Miles Per Trip** = 0.09 miles/trip

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

- \( k = 0.0011 \)  
- \( sL = 9.7 \)  
- \( W = 13.5 \)  

**Mitigated Emission Factor,** \( \text{E} = \left[ \text{Ef} \times \left[ 1 - \left( \frac{p}{4N} \right) \right] \right] \) (Equation 2 from AP-42 13.2.1)

- \( p = 125 \)  
- \( N = 365 \)  

**Dust Control Efficiency** = 0.0% 0.0% 0.0% (pursuant to control measures outlined in fugitive dust control plan)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trailer movement</td>
<td>2.35</td>
<td>0.47</td>
<td>0.12</td>
<td>2.35</td>
<td>0.47</td>
<td>0.12</td>
</tr>
<tr>
<td>Trucks, entering plant</td>
<td>0.10</td>
<td>1.95E-02</td>
<td>4.80E-03</td>
<td>0.10</td>
<td>1.95E-02</td>
<td>4.80E-03</td>
</tr>
<tr>
<td>Trucks, leaving plant</td>
<td>0.10</td>
<td>1.95E-02</td>
<td>4.80E-03</td>
<td>0.10</td>
<td>1.95E-02</td>
<td>4.80E-03</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>2.54</strong></td>
<td><strong>0.51</strong></td>
<td><strong>0.12</strong></td>
<td><strong>2.54</strong></td>
<td><strong>0.51</strong></td>
<td><strong>0.12</strong></td>
</tr>
</tbody>
</table>

**Methodology**

- **Total Weight driven per day (ton/day):** \( = \left[ \text{Maximum Weight of Loaded Vehicle (tons/trip)} \right] \times \left[ \text{Maximum trips per day (trip/day)} \right] \)
- **Average Vehicle Weight Per Trip (ton/trip):** \( = \frac{\text{Total Weight driven per day (ton/day)}}{\text{Maximum trips per day (trip/day)}} \)
- **Average Miles Per Trip (miles/trip):** \( = \frac{\text{Maximum one-way distance (miles/yr)}}{\text{Maximum trips per year (trip/day)}} \)
- **Unmitigated PTE (tons/yr):** \( = \left[ \text{Maximum one-way miles (miles/yr)} \times \text{Unmitigated Emission Factor (lb/mile)} \right] \times \left[ \text{ton/2000 lbs} \right] \)
- **Mitigated PTE (Before Control) (tons/yr):** \( = \left[ \text{Mitigated Emission Factor (lb/mile)} \right] \times \left[ \text{Maximum one-way miles (miles/yr)} \right] \times \left[ \text{ton/2000 lbs} \right] \)
- **Dust Control Efficiency:** \( = \left[ \text{1 - Mitigated Emission Factor (lb/mile)} \right] \times \left[ \text{ton/2000 lbs} \right] \)
Appendix A: Emissions Calculations  
Manual Grinding (EU-13)

**Company Name:** Haulmark Trailers of IN, Inc.  
**Source Address:** 14054 CR 4 East, Bristol, IN 46507  
**SPR No.:** 039-41420-00254  
**Reviewer:** Doug Logan  
**Date:** 9/23/2019

<table>
<thead>
<tr>
<th>Weld Wire Throughput</th>
<th>Emission Factor(^1)</th>
<th>Potential to Emit PM/PM(<em>{10})/PM(</em>{2.5})</th>
</tr>
</thead>
<tbody>
<tr>
<td>(lb/hr) (tons/hr)</td>
<td>(lb/ton) (lb/hr) (tons/yr)</td>
<td></td>
</tr>
<tr>
<td>228.21 0.11</td>
<td>0.01 1.14E-03 5.00E-03</td>
<td></td>
</tr>
</tbody>
</table>

1. Emission factor from WebFIRE (SCC 3-04-003-60, castings finishing) considered representative of deburring operations
October 9, 2019

Jeff Howes
Haulmark Trailers of IN
1503 McNaughton Ave
Elkhart, IN 46514

Re: Public Notice
Haulmark Trailers of IN, Inc.
Permit Level: FESOP Significant Permit Rev
Permit Number: 039-41420-00254

Dear Jeff Howes:

Enclosed is a copy of your draft FESOP Significant Permit Rev (Minor PSD/EO) (120), Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Bristol Washington Township Public Library 505 West Vistula Street Bristol IN 46507-0789. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Doug Logan, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5328 or dial (317) 234-5328.

Sincerely,
L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 9, 2019

To: Bristol Washington Township Public Library 505 West Vistula Street Bristol IN 46507-0789 (Library)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Haulmark Trailers of IN, Inc.
Permit Number: 039-41420-00254

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

October 9, 2019
Haulmark Trailers of IN, Inc.
039-41420-00254

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
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<th>Article Number</th>
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<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<tbody>
<tr>
<td>1</td>
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<td>Jeff Howes, Haulmark Trailers of IN, 1503 McNaughton Ave, Elkhart IN, 46514</td>
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<td>2</td>
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<td>Jeri Seely, The Mail-Journal, PO Box 188, Milford IN, 46542</td>
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<td>Mr. Roger Schneider, The Goshen News, 114 S. Main St, Goshen IN, 46526</td>
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<td>Abigail McDowel, RPS, 135 S LaSalle St, Ste. 3500, Chicago IL, 60603</td>
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<td>Elkhart County Health Department, 608 Oakland Avenue, Elkhart IN, 46516</td>
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<td>Bristol Town Council and Town Manager, P.O. Box 305, Bristol IN, 46507</td>
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<td>7</td>
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<td>Elkhart County Board of Commissioners, 117 North Second St, Goshen IN, 46526</td>
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<td>Bristol Washington Township Public Library, 505 West Vistula Street, Bristol IN, 46507-0789</td>
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Total number of pieces Listed by Sender: 15
Total number of Pieces Received at Post Office: 15
Postmaster, Per (Name of Receiving employee):

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.