NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit Renewal

for Wabash National Corporation (South) in Tippecanoe County

Significant Source Modification No.: 157-43422-00068
Significant Permit Modification No.: 157-43401-00068

The Indiana Department of Environmental Management (IDEM) has received an application from Wabash National Corporation (South), located at 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909, for a significant modification of its Part 70 Operating Permit Renewal issued on March 17, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Wabash National Corporation (South) to make certain changes at its existing source. Wabash National Corporation (South) has applied to construct and operate one (1) new head press operation that consists of polishers, plasma tables, welders, and a grinder.

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). 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 have been sent to:

Tippecanoe County Public Library
627 South St.
Lafayette, IN 47901

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access 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.

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) 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 SSM 157-43422-00068 and SPM 157-43401-00068 in all correspondence.

Comments should be sent to:

Michaela Hecox
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031
Or dial directly: (317) 233-3031
Fax: (317) 232-6749 attn: Michaela Hecox
E-mail: MHecox@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; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library 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 Michaela Hecox of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Mr. David Mead  
Wabash National Corporation  
P.O. Box 6129  
Lafayette, IN 47903

Re: 157-43422-00068  
Significant Source Modification

Dear Mr. Mead:

Wabash National Corporation (South) was issued Part 70 Operating Permit Renewal No. T157-40702-00068 on March 17, 2020 for a stationary truck trailers operation located at 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909. An application to modify the source was received on October 19, 2020. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2020 for construction, consisting of the following:

(1) One (1) Hand Plasma Station, utilized to trim out the trailer heads as they are removed from the head press, with a maximum cutting rate of 318 inches per hour, controlled by a ACT5-20 Dust Collector, and exhausting indoors.

(2) Two (2) Seamer TIG/MIG Welders, utilized to weld seams utilizing a common filler wire, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

(3) Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and exhausting indoors.

(4) One (1) MG Dome Plasma Table with an associated hand plasma cutter for part removal, utilized to cut parts, with a combined maximum cutting speed of 489.3 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

(5) One (1) Sector Plasma Table, utilized to cut parts, with a maximum cutting speed of 30.0 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

(6) Two (2) portable GMAW/GTAW welders, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

(7) One (1) Seam Grinder, utilized to grind down or smooth out weld seams, with a maximum throughput rate of 4.0 parts per hour, and exhausting indoors.
The following construction conditions are applicable to the proposed modification:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this source modification 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 and 326 IAC 2-7-10.5(j), 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.

**Approval to Construct**

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source’s Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

A copy of the permit 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 application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access 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. 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).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
DRAFT

If you have any questions regarding this matter, please contact Michaela Hecox, 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) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

Sincerely,

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - Tippecanoe County
    Tippecanoe County Health Department
    U.S. EPA, Region 5
    Compliance and Enforcement Branch
Significant Source Modification

to a Part 70 Source

OFFICE OF AIR QUALITY

Wabash National Corporation (South)
3550 Veterans Memorial Parkway South
Lafayette, Indiana 47909

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

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Issued by: Brian Williams, Section Chief
Permits Branch
Office of Air Quality

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Attachment D: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]
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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary truck trailers operation.

| Source Address: | 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909 |
| General Source Phone Number: | (765) 771-5300 |
| SIC Code: | 3715 (Truck Trailers) |
| County Location: | Tippecanoe |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) Line 8, with a nominal capacity of 14 finished trailers per day, consisting of the following:

(1) Coupler Booth (PB2), with a nominal capacity of 60 couplers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB2S.

(2) Nose/Parts Booth (PB8), with a nominal capacity of 60 units per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB8S.

(3) Finishing Booth (PB3), with a nominal capacity of 60 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB3S.

Note: The Coupler Booth (PB2), Nose/Parts Booth (PB8), and Finishing Booth (PB3) can also operate as independent booths and not as Line 8 under Line 8 Alternative Operating Scenario (AOS - Line 8).

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(b) Three (3) paint booths for coating metal parts, identified as follows:

(1) Road Railer Bogie Booth (PB1), with a nominal capacity of 5.0 road railer bogies per day, constructed in 1995, utilizing the air atomized spray application method, using panel filters as control, and exhausting to stack PB1S.
(2) Offline Booth (PB10) located at the truck service and repair operation, with a nominal capacity of 6.0 trailers per day, constructed in 1998, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB10S.

(3) Tank Manufacture Booth (PB11), with a nominal capacity of 15 units per day, constructed in 2011, utilizing two airless spray applicators, using dry filters as control, and exhausting to stack PB11S.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(c) One (1) Refinishing/Repair Booth (PB9), with a nominal capacity of 12 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB9S.

Under 40 CFR 63, Subpart MMMM, this is considered part of an existing affected source.

(d) Two (2) blasting booths, identified as follows:

(1) BB1, with a nominal capacity of 1.26 tons of shot per hour, constructed in 1995, using a baghouse, BH1 as control, and exhausting to stack BH1.

(2) BB5, with four (4) blast pots and six (6) blast nozzles (only four (4) may be operated at any one time having a nominal capacity of 8.9 tons of shot per hour, constructed in 2011. The blast unit will utilize steel shot as the blast media and is controlled by a cartridge dust collector venting indoors.

(e) One (1) caulking operation, constructed in 1995 with a nominal capacity of 80 units per day.

(f) One (1) surface cleaning operation, constructed in 1995 with a nominal capacity of 36 units per day.

Under 40 CFR 63, Subpart MMMM, this is considered part of an existing affected source.

(g) One (1) decal application operation, constructed in 1995, with a nominal capacity of 36 units per day.

(h) Eight (8) stick welding stations for repairs, constructed in 1995 with a nominal capacity of 1.1 pounds of electrodes per hour each, two (2) Submerged Arc stations with a nominal capacity of 1.1 pounds of wire per hour each, one hundred twenty two (122) Metal Inert Gas (MIG) welding machines with a nominal capacity of 1.1 pounds of wire per hour each, one (1) wire welding unit with a nominal capacity of 125 pounds of wire per hour, constructed in 2011, and one (1) wire welding unit with a nominal capacity of 10 pounds of wire per hour, permitted in 2019.

(i) One (1) abrasive blast system, constructed in 2013, identified as BB-06, with one (1) aluminum oxide blast media gun with a maximum throughput rate of 3,000 lbs/hr, using a dust collector, BB-06-CE, as control, and exhausting outdoors.

(j) One (1) bonding operation, permitted in 2019, with a nominal capacity of 60.00 truck boxes per day and 16.80 portable storage containers per day.
(k) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2021 for construction, consisting of the following:

1. One (1) Hand Plasma Station, utilized to trim out the trailer heads as they are removed from the head press, with a maximum cutting rate of 318 inches per hour, controlled by a ACT5-20 Dust Collector, and exhausting indoors.

2. Two (2) Seamer TIG/MIG Welders, utilized to weld seams utilizing a common filler wire, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

3. Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and exhausting indoors.

4. One (1) MG Dome Plasma Table with an associated hand plasma cutter for part removal, utilized to cut parts, with a combined maximum cutting speed of 489.3 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

5. One (1) Sector Plasma Table, utilized to cut parts, with a maximum cutting speed of 30.0 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

6. Two (2) portable GMAW/GTAW welders, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

7. One (1) Seam Grinder, utilized to grind down or smooth out weld seams, with a maximum throughput rate of 4.0 parts per hour, and exhausting indoors.

A.3 Specifically Regulated Insignificant Activities

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

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operation.

(c) One (1) natural gas fired bake oven, constructed in 2013, identified as OV-1, with a maximum heat input of 1.50 MMBtu/hr.

(d) One (1) powder coating booth, constructed in 2013, identified as PB-12, with a maximum capacity of 32 lbs. of powder per hour, using an integral powder recovery system as control, and venting indoors.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.
(e) Emergency Generator, identified as EM-GEN, constructed in 2017, with a maximum capacity of 0.72 MMBtu/hr, uncontrolled, and exhausting to stack EM-Gen. Under 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ, this unit is considered an existing affected source.

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

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<tbody>
<tr>
<td>Shop Heat</td>
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<td>Applied Air</td>
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</tr>
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</table>

(g) Combustion source flame safety purging on startup.
(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity of less than or equal to 10,500 gallons.

(i) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

(j) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(k) Equipment used exclusively for the following: Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(l) Machining where an aqueous cutting coolant continuously floods the machining interface.

(m) Cleaners and solvents characterized as follows:

1. Having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees Celsius (100 degrees Fahrenheit) or;

2. Having vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(n) Degreasing operations that combined do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(o) One (1) machining-drilling operation, permitted in 2019.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

(a) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(b) Equipment used exclusively for the following: Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Cleaners and solvents characterized as follows:

1. Having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees Celsius (100 degrees Fahrenheit) or;

2. Having vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(e) Infrared cure equipment.

(f) Exposure chambers (towers, columns), for curing of ultraviolet inks and ultraviolet coating
where heat is the intended discharge.

(g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(h) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B  GENERAL CONDITIONS

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T157-40702-00068, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7] [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 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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.
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

4. For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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

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 2-7-5(3)(C)(ii) and must contain the following:
(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-4(c)(8) 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 2-7 and any other applicable rules.

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

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance,
IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T157-40702-00068 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised under 326 IAC 2-7-10.5, or

3. deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ 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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 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 5
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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(c) **Emission Trades [326 IAC 2-7-20(c)]**
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 2-7-20(c).

(d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) **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.20 **Source Modification Requirement [326 IAC 2-7-10.5]**
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 **Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) **Enter upon the Permittee’s premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;**

(b) **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 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 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 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.22 **Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

(a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**

(b) **Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**
Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [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 2-7-5(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 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.3 Open Burning  [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions  [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height  [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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(c).

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

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

**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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-5(1)][326 IAC 2-7-6(1)]

**C.10 Compliance Monitoring** [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [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.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]

(II) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.

CAM Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective
actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing,
reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) CAM recordkeeping requirements.
   (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

   (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]
   (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.
The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
(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 Part 70 permit.

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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]
(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

1. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

2. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

3. A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(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.19 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) Line 8, with a nominal capacity of 14 finished trailers per day, consisting of the following:

(1) Coupler Booth (PB2), with a nominal capacity of 60 couplers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB2S.

(2) Nose/Parts Booth (PB8), with a nominal capacity of 60 units per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB8S.

(3) Finishing Booth (PB3), with a nominal capacity of 60 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB3S.

Note: The Coupler Booth (PB2), Nose/Parts Booth (PB8), and Finishing Booth (PB3) can also operate as independent booths and not as Line 8 under Line 8 Alternative Operating Scenario (AOS - Line 8).

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(b) Three (3) paint booths for coating metal parts, identified as follows:

(1) Road Railer Bogie Booth (PB1), with a nominal capacity of 5.0 road railer bogies per day, constructed in 1995, utilizing the air atomized spray application method, using panel filters as control, and exhausting to stack PB1S.

(2) Offline Booth (PB10) located at the truck service and repair operation, with a nominal capacity of 6.0 trailers per day, constructed in 1998, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB10S.

(3) Tank Manufacture Booth (PB11), with a nominal capacity of 15 units per day, constructed, utilizing two airless spray applicators, using dry filters as control, and exhausting to stack PB11S.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(c) One (1) Refinishing/Repair Booth (PB9), with a nominal capacity of 12 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB9S.

Under 40 CFR 63, Subpart MMMM, this is considered part of an existing affected source.

Specifically Regulated Insignificant Activities:

(d) One (1) powder coating booth, constructed in 2013, identified as PB-12, with a maximum capacity of 32 lbs. of powder per hour, using an integral powder recovery system as control, and venting indoors.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.
(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 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limits for VOC [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

(a) The total VOC input to the seven (7) combined paint booths, identified as PB1, PB2, PB3, PB8, PB9, PB10, and PB11, shall not exceed 228.00 tons per twelve (12) consecutive month period.

Compliance with the VOC limits, in conjunction with the potential to emit VOC from all other emission units, shall limit the VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Volatile Organic Compound (VOC) content of coating delivered to the applicator at each paint booth, PB1, PB10, and PB11, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, each.

(b) Unless operating under Line 8 Alternative Operating Scenario (AOS- Line 8) and pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Volatile Organic Compound (VOC) content of coating delivered to each applicator at Line 8 (PB2, PB8, and PB3), shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

(c) Line 8 Alternative Operating Scenario (AOS- Line 8)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Volatile Organic Compound (VOC) content of coating delivered to the applicator at each paint booth, PB2, PB8, and PB3, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, each.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-10-3][326 IAC 8-10-4]
Pursuant to 326 IAC 8-10-4, the refinishing operations done in PB9 are subject to the requirements of 326 IAC 8-10, the Permittee shall comply with the following:

(a) The Permittee shall limit emissions of VOCs from refinishing operations subject to 326 IAC 8-10 by using coatings or surface preparation products with VOC limits based on the VOC content as applied.

The VOC content shall not exceed the following limits:

<table>
<thead>
<tr>
<th>Coating Category</th>
<th>VOC Content Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>grams/liter</td>
</tr>
<tr>
<td>Pretreatment wash primer</td>
<td>780</td>
</tr>
<tr>
<td>Precoat</td>
<td>660</td>
</tr>
<tr>
<td>Primer/primer surfacer</td>
<td>576</td>
</tr>
<tr>
<td>Primer sealer</td>
<td>552</td>
</tr>
</tbody>
</table>
Coating Category & VOC Content Limit & grams/liter & pounds/gallon
---
Topcoat & & & 
| Single and two stage | 600 | 5.0 |
| Three and four stage | 624 | 5.2 |
| Multicolored topcoat | 680 | 5.7 |
| Specialty | 840 | 7.0 |

For surface preparation products:

| Type of Substrate | VOC Content Limit & grams/liter & pounds/gallon |
|-------------------&---------------------------------|
| Plastic | 780 | 6.5 |
| Other | 168 | 1.4 |

(b) Application of all specialty coatings except anti-glare/safety coatings shall not exceed five percent (5%) by volume of all coatings applied on a monthly basis.

D.1.4 Volatile Organic Compounds (VOC) Work Practices [326 IAC 8-2-9] [326 IAC 8-10-3] [326 IAC 8-10-5]

(a) 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:

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

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


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

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

(b) For refinishing operations in booth PB9 that are subject to the requirements of 326 IAC 8-10, the Permittee shall comply with the work practice standards contained in 326 IAC 8-10-5 (included as Attachment A of this permit).

D.1.5 Particulate Emission Limitations [326 IAC 6-3-2(d)] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations PB1, PB2, PB3, PB8, PB9, PB10 and PB11 shall be controlled by a dry particulate filter, and the Permittee shall
operate the control device in accordance with manufacturer's specifications.

Compliance with this condition, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at the source, shall assure the PM, PM10, and PM2.5 emissions from the entire source are less than 250 tons per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.7 Particulate Control [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d), and in order to ensure compliance with Condition D.1.5, the dry filters for particulate control shall be in operation to control emissions from the paint booths PB1, PB2, PB3, PB8, PB9, PB10 and PB11 at all times when the facility is in operation.

(b) The integral powder recovery system for particulate control shall be in operation and control emissions from the powder coating booth PB-12 at all times the powder coating booth PB-12 is in operation.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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 Volatile Organic Compounds (VOC) [326 IAC 8-10-3][326 IAC 8-10-7][326 IAC 8-1-4]

Pursuant to 326 IAC 8-10-7, compliance with the VOC content limits contained in Condition D.1.3 shall be determined pursuant to the applicable test methods and requirements of 326 IAC 8-1-4 and 40 CFR 60, Appendix A. The Permittee may use data provided with coatings or surface preparation products formulation information such as the container label, product data sheets, and MSDS sheet. IDEM, OAQ and the U.S. EPA may require VOC content determination and verification of any coating or surface preparation product using 40 CFR 60, Appendix A, Method 24. In the event of any inconsistency between 40 CFR 60, Appendix A, Method 24 and formulation data, 40 CFR 60, Appendix A, Method 24 shall govern.

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) To determine compliance with Condition D.1.1, monthly VOC emissions from the surface coating operations shall be determined using the following calculation:

\[
E = \sum_{n=1}^{7} \frac{(Q_{cn} + Q_{sn})}{2000}
\]
Where:

\[ E = \text{VOC emissions (tons/month)} \]
\[ n = \text{booth (PB1, PB2, PB3, PB8, PB9, PB10, PB11)} \]
\[ QC_n = \text{Total VOC content of surface coating material used in booth (n) (pounds/month)} \]
\[ QS_n = \text{Total VOC content of solvents and clean-up material used in booth (n) (pounds/month)} \]

(b) Compliance with the VOC content limit in condition D.1.2 shall be determined as follows:

1. To determine compliance with Condition D.1.2(a), a daily volume weighted average of coatings shall be calculated for PB1 when non-compliant coating are used.

2. To determine compliance with Condition D.1.2(a), a daily volume weighted average of coatings shall be calculated for PB10 when non-compliant coatings are used.

3. To determine compliance with Condition D.1.2(a), a daily volume weighted average of coatings shall be calculated for PB11, when non-compliant coating are used.

4. When operating under AOS - Line 8, to determine compliance with Condition D.1.2(c), a daily volume weighted average of coatings shall be calculated for PB2, when non-compliant coating are used.

5. When operating under AOS - Line 8, to determine compliance with Condition D.1.2(c), a daily volume weighted average of coatings shall be calculated for PB8, when non-compliant coating are used.

6. When Line 8 is operating under AOS - Line 8, to determine compliance with Condition D.1.2(c), a daily volume weighted average of coatings shall be calculated for PB3, when non-compliant coating are used.

Pursuant to 326 IAC 8-1-2(a)(7), the volume weighted average for each booth shall be determined by the following equation:

\[ A = \frac{\sum (c \times U)}{\sum U} \]

Where:

\[ A = \text{the volume weighted average in pounds VOC per gallon less water as applied;} \]
\[ C = \text{the VOC content of the coating in pounds VOC per gallon less water as applied;} \]
\[ U = \text{the usage rate of the coating in gallons per day.} \]

(c) Unless Line 8 is operating under AOS - Line 8, to determine compliance with Condition D.1.2(b), a daily volume weighted average of coatings shall be calculated for PB2, PB8, and PB3, when non-compliant coatings are used.

Pursuant to 326 IAC 8-1-2(a)(7), the volume weighted average for Line 8 shall be determined by the following equation:
\[
A = \left( \frac{\sum (c_n \times U_n)}{\sum U_n} \right)
\]

Where:

\( A \) = the volume weighted average in pounds VOC per gallon less water as applied;

\( n = \) booth (PB2, PB3, PB8)

\( c_n \) = the VOC content of the coating in pounds VOC per gallon less water as applied;

and

\( U_n \) = the usage rate of the coating in gallons per day.

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

**D.1.11 Monitoring [40 CFR 64]**

Daily inspections shall be performed to verify the placement, integrity and particle loading of the panel filters of both the Nose/Parts Booth (PB8) and the Tank Manufacture Booth (PB11). If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

**D.1.12 Operator Training and Monitoring**

The surface coating booth stacks PB1S, PB2S, PB3S, PB8S, PB9S, PB10S, and PB11S have applicable compliance monitoring conditions as specified below:

(a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

(b) The Permittee shall implement an operator training program with the following requirements:

(1) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

(c) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

**D.1.13 Integral Powder Recovery System Inspections**

The Permittee shall perform quarterly inspections of the integral powder recovery system controlling particulate emissions from the powder coating booth PB-12 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 pieces of the integral powder recovery system shall be replaced.
D.1.14 Integral Powder Recovery System Failure Detection

In the event that an integral powder recovery system failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the powder coating booth PB-12. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.15 Record Keeping Requirements [326 IAC 8-10-3][326 IAC 8-10-5(d)(4)][326 IAC 8-10-9]

For refinishing operations subject to the requirements of 326 IAC 8-10, the Permittee shall comply with the record keeping requirements contained in 326 IAC 8-10-9 (included as Attachment A of this permit).

D.1.16 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 (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1 and D.1.2.

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

(2) The amount of coating material and solvent used on daily basis for each booth.

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

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

(3) The daily cleanup solvent usage; and

(4) The total VOC usage for each day.

(5) The dates and times when non-compliant coatings are used and at what booth the non-compliant coatings are used.

(6) The dates and times when Line 8 operates under Line 8 Alternative Operating Scenario (AOS - Line 8).

(7) During periods when non-compliant coatings are used:

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

(b) To document the compliance status with Condition D.1.11, the Permittee shall maintain a log of the daily inspections of the filters. The Permittee shall include in its daily record when an observation or inspection is not performed and the reason for the lack of observation or inspection (i.e. the process did not operate that day).

(c) To document the compliance status with Condition D.1.13, the Permittee shall maintain
records of the dates and results of the inspections required under D.1.13.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

D.1.17 Reporting Requirements [326 IAC 8-10-3][326 IAC 8-10-6(c)][326 IAC 8-10-9(e)]
For refinishing operations subject to the requirements of 326 IAC 8-10, the Permittee shall comply with the reporting requirements contained in 326 IAC 8-10-6(c) and 326 IAC 8-10-9 (included as Attachment A of this permit).

D.1.18 Reporting Requirements
A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Condition C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) Two (2) blasting booths, identified as follows:

(1) BB1, with a nominal capacity of 1.26 tons of shot per hour, constructed in 1995, using a baghouse, BH1 as control, and exhausting to stack BH1.

(2) BB5 with four (4) blast pots and six (6) blast nozzles (only four (4) may be operated at any one time having a nominal capacity of 8.9 tons of shot per hour, constructed. The blast unit will utilize steel shot as the blast media and is controlled by a cartridge dust collector venting indoors.

(j) One (1) abrasive blast system, constructed in 2013, identified as BB-06, with one (1) aluminum oxide blast media gun with a maximum throughput rate of 3,000 lbs/hr, using a dust collector, BB-06-CE, as control, and exhausting outdoors.

(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 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration (PSD) Minor Limits for PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Device</th>
<th>Pollutant</th>
<th>Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BB5</td>
<td>cartridge dust collector</td>
<td>PM</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM2.5</td>
<td>1.00</td>
</tr>
<tr>
<td>BB-06</td>
<td>BB-06-CE cartridge dust collector</td>
<td>PM</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM2.5</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Compliance with the above limits, in conjunction with the other limits outlined in the permit and the potential to emit PM/PM10/PM2.5 from other emission units and insignificant activities at the source, shall limit the PM/PM10/PM2.5 emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

D.2.2 Particulate Matter (PM)  [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the two (2) shot blasting units (identified as BB1 and BB5) and abrasive blast system (BB-06) shall not exceed the pounds per hour emission limitations when operating at the process weight rates shown below:

<table>
<thead>
<tr>
<th>Units</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Particulate Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blaster (BB1)</td>
<td>1.26</td>
<td>4.79</td>
</tr>
<tr>
<td>Shot Blaster (BB5)</td>
<td>8.9</td>
<td>17.74</td>
</tr>
<tr>
<td>Abrasive Blast System (BB-06)</td>
<td>1.5</td>
<td>5.38</td>
</tr>
</tbody>
</table>
The pounds per hour limitation was calculated with the following equation:

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.4 Particulate Control

(a) In order to ensure compliance with Condition D.2.1 and D.2.2, the cartridge dust collector for particulate control shall be in operation to control emissions from shot blasting BB5 at all times when the shot blaster is in operation.

(b) In order to ensure compliance with Condition D.2.1 and D.2.2, the cartridge dust collector for particulate control shall be in operation to control emissions from abrasive blast system (BB-06) at all times when the shot blaster is in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations [40 CFR 64]

(a) Visible emission notations of the stack exhaust from BB5 and BB-06 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.2.6 Broken or Failed Bag Detection

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain a daily record of the visible emission notations of the stack exhaust from facilities BB5 and BB-06. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(h) Eight (8) stick welding stations for repairs, constructed in 1995 with a nominal capacity of 1.1 pounds of electrodes per hour each, two (2) Submerged Arc stations with a nominal capacity of 1.1 pounds of wire per hour each, one hundred twenty two (122) Metal Inert Gas (MIG) welding machines with a nominal capacity of 1.1 pounds of wire per hour each, one (1) wire welding unit with a nominal capacity of 125 pounds of wire per hour, constructed in 2011, and one (1) wire welding unit with a nominal capacity of 10 pounds of wire per hour, permitted in 2019.

Specifically Regulated Insignificant Activities:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operation.

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

<table>
<thead>
<tr>
<th>South Plant Building 8</th>
<th>Location</th>
<th>Quantity</th>
<th>Manufacturer</th>
<th>MMBTU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Side prep</td>
<td>1</td>
<td>Sterling Alton</td>
<td>3.13</td>
<td></td>
</tr>
<tr>
<td>Line Maintenance</td>
<td>1</td>
<td>Applied Air</td>
<td>1.25</td>
<td></td>
</tr>
<tr>
<td>Metal Fab</td>
<td>1</td>
<td>Applied Air</td>
<td>0.40</td>
<td></td>
</tr>
<tr>
<td>Outside PX</td>
<td>1</td>
<td>Applied Air</td>
<td>3.13</td>
<td></td>
</tr>
<tr>
<td>Roof Foam</td>
<td>2</td>
<td>Applied Air</td>
<td>0.50</td>
<td></td>
</tr>
<tr>
<td>Side Foam</td>
<td>2</td>
<td>Applied Air</td>
<td>0.40</td>
<td></td>
</tr>
<tr>
<td>Roof Pit</td>
<td>1</td>
<td>Sterling Alton</td>
<td>1.25</td>
<td></td>
</tr>
<tr>
<td>Customer Supply</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>Rail Bogie</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>West Dock</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>Sidetable</td>
<td>8</td>
<td>Ceiling Unit</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>5S / Wood Shop</td>
<td>4</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
<td></td>
</tr>
<tr>
<td>East Dock</td>
<td>4</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
<td></td>
</tr>
<tr>
<td>Wash Bay</td>
<td>3</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
<td></td>
</tr>
<tr>
<td>Finish</td>
<td>3</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
<td></td>
</tr>
<tr>
<td>Roof Unit</td>
<td>4</td>
<td>Air make-up</td>
<td>6.01</td>
<td></td>
</tr>
<tr>
<td>Metal Fab Office Roof Unit</td>
<td>1</td>
<td>Lennex</td>
<td>0.27</td>
<td></td>
</tr>
<tr>
<td>Cafeteria Roof Unit</td>
<td>1</td>
<td>Trane</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>HR / Offices / Con. Room</td>
<td>5</td>
<td>Lennex</td>
<td>0.27</td>
<td></td>
</tr>
<tr>
<td>Front Office</td>
<td>1</td>
<td>Water Heater</td>
<td>0.20</td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td>Quantity</td>
<td>Manufacturer</td>
<td>MMBTU</td>
<td></td>
</tr>
<tr>
<td>-------------------</td>
<td>----------</td>
<td>--------------------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>Manufacturing Heat</td>
<td>5</td>
<td>Thermo Rotation</td>
<td>0.85</td>
<td></td>
</tr>
<tr>
<td>West Dock</td>
<td>1</td>
<td>Lennox Ceiling Unit</td>
<td>0.25</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location</th>
<th>Quantity</th>
<th>Manufacturer</th>
<th>MMBTU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shop Heat</td>
<td>1</td>
<td>Applied Air</td>
<td>3.13</td>
</tr>
</tbody>
</table>

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity of less than or equal to 10,500 gallons.

(r) Degreasing operations that combined do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(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 2-7-5(1)]

**D.3.1 Particulate Emissions [326 IAC 6-2-4]**

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

<table>
<thead>
<tr>
<th>Building</th>
<th>Emission Unit</th>
<th>Pt (lb/MBBTu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Roof Foam</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Side Foam</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Roof Pit</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Customer Supply</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Rail Bogie</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>West Dock</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Sidetable</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>5S / Wood Shop</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>East Dock</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Wash Bay</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Finish</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Roof Unit</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Metal Fab Office Roof Unit</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Cafeteria Roof Unit</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>HR / Offices / Con. Room</td>
<td>0.371</td>
</tr>
<tr>
<td>8</td>
<td>Front Office</td>
<td>0.371</td>
</tr>
<tr>
<td>27</td>
<td>Manufacturing Heat</td>
<td>0.371</td>
</tr>
<tr>
<td>27</td>
<td>West Dock</td>
<td>0.371</td>
</tr>
<tr>
<td>18</td>
<td>Shop Heat</td>
<td>0.371</td>
</tr>
</tbody>
</table>
D.3.2 Particulate Matter Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed the pounds per hour emission limitations when operating at the process weight rates shown below:

<table>
<thead>
<tr>
<th>Units</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Particulate Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>grinding and machining room</td>
<td>0.15</td>
<td>1.15</td>
</tr>
<tr>
<td>wire welding ER70S-6</td>
<td>0.0625</td>
<td>0.64</td>
</tr>
</tbody>
</table>

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
- \( P \) = process weight rate in tons per hour

D.3.3 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

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

(b) Ensure the following additional control equipment and operating requirements are met:

1. Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
   (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
   (B) A water cover when solvent used is insoluble in, and heavier than, water.
   (C) A refrigerated chiller.
   (D) Carbon adsorption.
   (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the
department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

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

D.3.5 Gasoline Dispensing Facilities [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6 (Gasoline Dispensing Facilities), the Stage I vapor recovery system requirements at gasoline dispensing facilities are as follows:

(a) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:

   (1) A submerged fill pipe that extends to not more than:
       (A) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
       (B) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.

   (2) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.

   (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.

(b) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:

   (1) connected between the transport and the storage tank; and
   (2) operating according to manufacturer's specifications.

Upon request by the department, the owner or operator of a gasoline dispensing facility that claims to be exempt from the requirements of this section shall submit records to the agency within thirty (30) calendar days from the date of the request that demonstrate that the gasoline dispensing facility is in fact exempt.

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

D.3.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.5, the Permittee shall maintain
records at the source of the throughput of gasoline received and dispensed, including purchase orders and invoices necessary to verify the type and amount.

(b) Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:

(1) The name and address of the solvent supplier.
(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
(3) The type of solvent purchased.
(4) The total volume of the solvent purchased.
(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition.
SECTION D.4  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(k) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2021 for construction, consisting of the following:

(3) Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and 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 2-7-5(1)]

D.4.1 HAP Minor Limits [326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-4.1 (Major Source of HAPs) not applicable, the Permittee shall comply with the following emission limits for the two (2) polishers, identified as Polisher 1 (mid) and Polisher 2 (large):

(1) The combined chromium emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.

(2) The combined nickel emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.

(3) Combined total HAP emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 5.59 lb/hr.

Compliance with these limits shall limit the combined HAP emissions from these units to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) are rendered not applicable to the Polisher 1 (mid) and Polisher 2 (large).

D.4.2 Particulate Matter Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed the pounds per hour emission limitations when operating at the process weight rates shown below:

<table>
<thead>
<tr>
<th>Units</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Particulate Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polisher 1 (mid)</td>
<td>2.0</td>
<td>6.52</td>
</tr>
<tr>
<td>Polisher 2 (large)</td>
<td>2.0</td>
<td>6.52</td>
</tr>
</tbody>
</table>

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.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]
A Preventive Maintenance Plan is required for this facility and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.4.4 Particulate and HAPs Control
In order to ensure compliance with Conditions D.4.1 and D.4.2, the Hydrotron Air/Water Filtration Unit for particulate and HAP control shall be in operation to control emissions from Polisher 1 (mid) and Polisher 2 (large) at all times when the Polishers are in operation.

In the event that a failure has been observed at the Hydrotron Air/Water Filtration Unit, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.4.5 Parametric Monitoring
The Permittee shall record the pressure drop across the Hydrotron Air/Water Filtration Unit at least once per day when the associated Polisher 1 (mid) and Polisher 2 (large) are in operation. When, for any one reading, the pressure drop across the Hydrotron Air/Water Filtration Unit is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 4.5 and 9.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced per the manufacturer's recommendations.

D.4.6 Broken or Failed Dust Collector Detection
(a) For a single compartment Hydrotron Air/Water Filtration Unit controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment Hydrotron Air/Water Filtration Unit controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the
emergency provisions of this permit (Section B - Emergency Provisions).

A failure can be indicated by a significant drop in the Hydrotron Air/Water Filtration Unit's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.4.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.5, the Permittee shall maintain daily records of pressure drop across the Hydrotron Air/Water Filtration Unit. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.
SECTION E.1 NSPS

Specifically regulated Insignificant Activities:

(h) Emergency Generator, identified as EM-GEN, constructed in 2017, with a maximum capacity of 0.72MMBtu/hr, uncontrolled, and exhausting to stack EM-Gen.

Under 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ, this unit is considered an existing affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.1.2 New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.4230, (a)(6), and (c)
(2) 40 CFR 60.4233(d)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4236(c)
(5) 40 CFR 60.4237(c)
(6) 40 CFR 60.4243(b)(1), (d)(1), (d)(2)(i), (d)(3), (e), and (f)
(7) 40 CFR 60.4245(a)
(8) 40 CFR 60.4246
(9) 40 CFR 60.4248
SECTION E.2  NESHAP

Emissions Unit Description:

(a) Line 8, with a nominal capacity of 14 finished trailers per day, consisting of the following:

(1) Coupler Booth (PB2), with a nominal capacity of 60 couplers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB2S.

(2) Nose/Parts Booth (PB8), with a nominal capacity of 60 units per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB8S.

(3) Finishing Booth (PB3), with a nominal capacity of 60 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB3S.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(b) Three (3) paint booths for coating metal parts, identified as follows:

(1) Road Railer Bogie Booth (PB1), with a nominal capacity of 5.0 road railer bogies per day, constructed in 1995, utilizing the air atomized spray application method, using panel filters as control, and exhausting to stack PB1S.

(2) Offline Booth (PB10) located at the truck service and repair operation, with a nominal capacity of 6.0 trailers per day, constructed in 1998, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB10S.

(3) Tank Manufacture Booth (PB11), with a nominal capacity of 15 units per day, constructed in 2011, utilizing two airless spray applicators, using dry filters as control, and exhausting to stack PB11S.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.

(c) One (1) Refinishing/Repair Booth (PB9), with a nominal capacity of 12 trailers per day, constructed in 1995, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB9S.

Under 40 CFR 63, Subpart MMMM, this is considered part of an existing affected source.

(f) One (1) surface cleaning operation, constructed in 1995 with a nominal capacity of 36 units per day.

Under 40 CFR 63, Subpart MMMM, this is considered part of an existing affected source.

(d) One (1) powder coating booth, constructed in 2013, identified as PB-12, with a maximum capacity of 32 lbs. of powder per hour, using an integral powder recovery system as control, and venting indoors.

Under 40 CFR 63, Subpart MMMM, these are considered part of an existing affected source.
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMM.

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

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

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM] [326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMMM (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-80 for the emission unit(s) listed above:

1. 40 CFR 63.3880
2. 40 CFR 63.3881
3. 40 CFR 63.3882
4. 40 CFR 63.3883 (a),(b)
5. 40 CFR 63.3890 (a)(1), (b)(1)
6. 40 CFR 63.3891 (a), (b)
7. 40 CFR 63.3892 (a)
8. 40 CFR 63.3893 (a)
9. 40 CFR 63.3900 (a)(1) and (b)
10. 40 CFR 63.3901
11. 40 CFR 63.3910, except (c)(10) and (11)
12. 40 CFR 63.3920, (a)
13. 40 CFR 63.3930
14. 40 CFR 63.3931
15. 40 CFR 63.3940
16. 40 CFR 63.3941
17. 40 CFR 63.3942
18. 40 CFR 63.3950
19. 40 CFR 63.3951
20. 40 CFR 63.3952
21. 40 CFR 63.3960
22. 40 CFR 63.3961
23. 40 CFR 63.3965(a)
24. 40 CFR 63.3980
25. 40 CFR 63.3981
26. Table 2
(27) Table 3
(28) Table 4
SECTION E.3 NESHAP

Emissions Unit Description:

(e) Emergency Generator, identified as EM-GEN, constructed in 2017, with a maximum capacity of 0.72MMBtu/hr, uncontrolled, and exhausting to stack EM-Gen.

Under 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ, this unit is considered an existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

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

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


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
(4) 40 CFR 63.6595(a)(5)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Wabash National Corporation (South)
Source Address: 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909
Part 70 Permit No.: T157-40702-00068

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: ______________________________________________________________________

Phone: __________________________________________________________________________

Date: __________________________________________________________________________
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Wabash National Corporation (South)
Source Address: 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909
Part 70 Permit No.: T157-40702-00068

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 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

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

| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ____________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

Part 70 Quarterly Report

Source Name: Wabash National Corporation (South)  
Source Address: 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909  
Part 70 Permit No.: T157-40702-00068  
Facility: PB1, PB2, PB3, PB8, PB9, PB10, and PB11  
Parameter: VOC Emissions  
Limit: 228 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

<table>
<thead>
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<tr>
<td></td>
<td>VOC (tons)</td>
<td>VOC (tons)</td>
<td>VOC (tons)</td>
</tr>
<tr>
<td>This Month</td>
<td></td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
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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: ________________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Wabash National Corporation (South)
Source Address: 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909
Part 70 Permit No.: T157-40702-00068

Months: ___________ to ____________ Year: ______________

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

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Wabash National Corporation (South)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>3550 Veterans Memorial Parkway South, Lafayette, IN 47909</td>
</tr>
<tr>
<td>County:</td>
<td>Tippecanoe</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3715 (Truck Trailers)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>T 157-40702-00068</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>March 17, 2020</td>
</tr>
<tr>
<td>Significant Source Modification No.:</td>
<td>157-43422-00068</td>
</tr>
<tr>
<td>Significant Permit Modification No.:</td>
<td>157-43401-00068</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Michaela Hecox</td>
</tr>
</tbody>
</table>

Source Definition

This truck and trailer manufacturing plant consists of two (2) plants:

(a) Plant 1 is located at 3550 Veterans Memorial Parkway South, Lafayette, Indiana 47909; and
(b) Plant 2 is located at 3460 McCarty Lane, Lafayette, Indiana 47905.

IDEM, OAQ has determined that the Wabash National Corporation (North) located at 3460 McCarty Lane, Lafayette and the Wabash National Corporation (South) plant located at 3550 Veterans Memorial Parkway South, Lafayette are not part of the same major source and that the plants should be permitted as separate sources. The term “major source” is defined by rule at 326 Indiana Administrative Code (IAC) 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

1. the plants must be under common ownership or common control;
2. the plants must have the same two digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and
3. the plants must be located on contiguous or adjacent properties.

The North Plant and the South Plant have the same owner. The two plants have the same two digit SIC code. There is no raw material, intermediate product, or final product that is transferred from one plant to the other, so there is no support relationship. The supervisor of each plant does report to the same manager. The direct distance between the two plants is approximately 2.5 miles. The travel distance between the two plants by road is more than 5 miles.

IDEM, OAQ determined that the North Plant and the South Plant are separate sources because they are not located on contiguous or adjacent properties. The two plants are 2.5 miles apart, the shortest route between the two plants is more than 5 miles, and there is no material or other output going from one plant to the other.
IDEМ, OAQ has reviewed whether the Wabash National plant located at Veterans Memorial Parkway South, Lafayette (the South Plant), the Wabash National plant located at 3600 East County Road 350 South, Lafayette (the Warehouse), and the Wabash National plant located at 3700 East County Road 350 South, Lafayette (the Repair Plant) are part of the same major source. The term “major source” is defined by rule at 326 Indiana Administrative Code 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two digit Standard Industrial Classification (SIC) Code or one or more must serve as a support facility for another; and,

(3) the plants must be located on contiguous or adjacent properties.

The three plants have the same owner, so they are under common ownership. All of the repairs done at the Repair Plant are done to support the operation at the South Plant. The Warehouse provides all of its output to the South Plant. The Warehouse and the Repair Plant are support facilities to the South Plant. All three plants are located on one contiguous piece of property. The three plants meet all the parts of the major source definition. IDEМ, OAQ has determined that the South Plant, the Warehouse and the Repair Plant are all part of the same major source.

This determination was initially made under Part 70 Permit Renewal No. 157-32878-00068, issued on August 18, 2014.

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. 157-40702-00068 on March 17, 2020. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Tippecanoe 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 January 16, 2018, for the 2015 8-hour ozone standard.</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>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour 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 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>

(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. Tippecanoe 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$_{2.5}$
Tippecanoe 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
Tippecanoe 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 modification, 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 Modification (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1,2$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>52.72</td>
<td>52.14</td>
<td>52.13</td>
<td>1.13</td>
<td>23.32</td>
<td>247.65</td>
<td>20.09</td>
<td>101.71</td>
<td>300.07</td>
</tr>
</tbody>
</table>
### Source-Wide Emissions Prior to Modification (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀⁻¹</th>
<th>PM₂.⁵⁻¹⁻²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAP&lt;br&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title V Major Source</strong>&lt;br&gt;Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>10</td>
<td>25</td>
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<tr>
<td><strong>PSD Major Source</strong>&lt;br&gt;Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>----</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Emission Offset Major</strong>&lt;br&gt;Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.⁵, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.⁵ listed is direct PM₂.⁵.
³Single highest source-wide HAP is Toluene.
*Fugitive HAP emissions are always included in the source-wide emissions.
PB-12 is controlled by an integral powder recovery system.

(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 a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(c) These emissions are based on the TSD of TV Renewal No. 157-40702-00068, issued on March 17, 2020.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Wabash National Corporation (South) on October 19, 2020, relating to the installation of one (1) new head press operation that consists of polishers, plasma tables, welders, and a grinder.

The following is a list of the new emission units and pollution control device(s):

(a) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2021 for construction, consisting of the following:

(1) One (1) Hand Plasma Station, utilized to trim out the trailer heads as they are removed from the head press, with a maximum cutting rate of 318 inches per hour, controlled by a ACT5-20 Dust Collector, and exhausting indoors.

(2) Two (2) Seamer TIG/MIG Welders, utilized to weld seams utilizing a common filler wire, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

(3) Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and exhausting indoors.

(4) One (1) MG Dome Plasma Table with an associated hand plasma cutter for part removal, utilized to cut parts, with a combined maximum cutting speed of 489.3 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.
(5) One (1) Sector Plasma Table, utilized to cut parts, with a maximum cutting speed of 30.0 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

(6) Two (2) portable GMAW/GTAW welders, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

(7) One (1) Seam Grinder, utilized to grind down or smooth out weld seams, with a maximum throughput rate of 4.0 parts per hour, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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 2-7-10.5. This table reflects the PTE before controls. 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$_{2.5}^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$_2$</th>
<th>Total HAPs</th>
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</thead>
<tbody>
<tr>
<td>HP Thermal Cutting</td>
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<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>0.09</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.01</td>
<td>0.02</td>
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<tr>
<td>HP Polisher 1 (mid)</td>
<td>43.80</td>
<td>43.80</td>
<td>43.80</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>14.89</td>
<td>31.56</td>
</tr>
<tr>
<td>HP Polisher 2 (large)</td>
<td>43.80</td>
<td>43.80</td>
<td>43.80</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>14.89</td>
<td>31.56</td>
</tr>
<tr>
<td>HP Seam Grinder</td>
<td>0.98</td>
<td>0.98</td>
<td>0.98</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>5.18E-04</td>
<td>9.8E-04</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>88.91</strong></td>
<td><strong>88.91</strong></td>
<td><strong>88.91</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>29.87</strong></td>
<td><strong>63.33</strong></td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP is Nickel.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM/PM10/direct PM2.5 at equal to or greater than twenty-five (25) tons per year.
Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit equal to or greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions.

### Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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>PM10</th>
<th>PM2.51</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>HP Thermal Cutting</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>HP Welding Operations</td>
<td>0.06</td>
<td>0.06</td>
<td>0.06</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>HP Polisher 1 (mid)</td>
<td>43.80</td>
<td>43.80</td>
<td>43.80</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>HP Polisher 2 (large)</td>
<td>43.80</td>
<td>43.80</td>
<td>43.80</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>HP Seam Grinder</td>
<td>0.98</td>
<td>0.98</td>
<td>0.98</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total for Modification</strong></td>
<td><strong>88.91</strong></td>
<td><strong>88.91</strong></td>
<td><strong>88.91</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
</tr>
</tbody>
</table>

PSD Major Source Thresholds

<table>
<thead>
<tr>
<th>Emission Offset Major Source Thresholds</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.51</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1PM2.5 listed is direct PM2.5.

(a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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 After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM1</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>141.61</td>
</tr>
</tbody>
</table>

Total PTE of Entire Source Excluding Fugitives*
### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th>Source-Wide Source Thresholds</th>
<th>PM^1</th>
<th>PM_{10}</th>
<th>PM_{2.5}^{1,2}</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP^3</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>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
<td>--</td>
</tr>
</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 is Toluene.

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

PB-12 is controlled by an integral powder recovery system.

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

(b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

### Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX are not included in the permit, since this source is not primarily engaged in any one of the nine source categories listed in 40 CFR 63.11514(a) that use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), as defined in 40 CFR 63.11522.

(b) 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 modification.

**Compliance Assurance Monitoring (CAM):**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and 

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Pollutant</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hand Plasma Station</td>
<td>ACT5-20 Dust Collector</td>
<td>PM*</td>
<td>None</td>
<td>&lt; 100</td>
<td>&lt; 100</td>
<td>N ¹</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM2.5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>HAPs</td>
<td>&lt; 25 total</td>
<td>&lt; 10 single</td>
<td>&lt; 10 single</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MG Dome Plasma Table and Sector Plasma Table</td>
<td>Arcology cartridge filter</td>
<td>PM*</td>
<td>None</td>
<td>&lt; 100</td>
<td>&lt; 100</td>
<td>N ¹</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM2.5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>HAPs</td>
<td>&lt; 25 total</td>
<td>&lt; 10 single</td>
<td>&lt; 10 single</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polisher 1 and Polisher 2</td>
<td>Hydrotron Air/Water Filtration unit</td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt; 100</td>
<td>&lt; 100</td>
<td>N ¹</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td>None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM2.5</td>
<td>None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Nickel</td>
<td>326 IAC 2-4.1</td>
<td>&gt; 10 single</td>
<td>&lt; 10 single</td>
<td></td>
<td></td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>Chromium</td>
<td>326 IAC 2-4.1</td>
<td>&gt; 10 single</td>
<td>&lt; 10 single</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total HAPs</td>
<td>326 IAC 2-4.1</td>
<td>&gt; 25 total</td>
<td>&lt; 25 total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

N ¹ CAM does not apply for pollutant because the uncontrolled PTE of pollutant is less than the major source threshold.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Polisher 1 (mid) and Polisher 2 (large), which are each considered as an “other unit,” for Nickel and Chromium.
issuance of the Part 70 Permit Renewal. A CAM plan must be submitted as part of the Part 70 Operating Permit Renewal application.

### State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

#### 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the and the Permit Level Determination - PSD Emissions Increase of this document.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of the Polisher 1 (mid) and Polisher 2 (large) will each emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, the Permittee has chosen to limit the emissions of HAPs to less than 10 tons and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1 does not apply.

1. The combined chromium emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.
2. The combined nickel emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.
3. Combined total HAP emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 5.59 lb/hr.

Compliance with these limits shall limit the combined HAP emissions from these units to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) are rendered not applicable to the Polisher 1 (mid) and Polisher 2 (large).

#### 326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

#### 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)
326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Tippecanoe County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Tippecanoe County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Due to this modification, 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(a), the requirements of 326 IAC 6-3-2 are applicable to Polisher 1 (mid) and Polisher 2 (large), since they are manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and they are not subject to a particulate 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).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from Polisher 1 (mid) and Polisher 2 (large) shall each not exceed 6.52 pounds per hour when operating at a process weight rate of 2.0 ton per hour. The pound per hour limitation was calculated with 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:

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

Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polisher 1 (mid)</td>
<td>2.0</td>
<td>6.52</td>
<td>(a)</td>
</tr>
<tr>
<td>Polisher 2 (large)</td>
<td>2.0</td>
<td>6.52</td>
<td>(a)</td>
</tr>
</tbody>
</table>

The Hydrotron Air/Water Filtration Unit shall be in operation at all times Polisher 1 (mid) and Polisher 2 (large) is in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-1(b)(6), torch cutting that cuts less than 3,400 inches per hour of stock one (1) inch thickness or less is exempt from the requirements of 326 IAC 6-3-2. Therefore, the hand plasma station, the MG Dome Plasma Table, and the Sector Plasma Table are not subject to the requirements of 326 IAC 6-3-2.

(c) Pursuant to 326 IAC 6-3-1(b)(9), welding operations that consume less than 625 pounds of rod or wire per day are exempt from 326 IAC 6-3-2. Therefore, the two (2) seam TIG/MIG welders and the two (2) portable GMAW/GTAW welders are not subject to the requirements of 326 IAC 6-3-2.

(d) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2. Therefore, the seam grinder is not subject to the requirements of 326 IAC 6-3-2.
Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

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

(1) The Hydrotron Air/Water Filtration Unit shall be in operation at all times Polisher 1 (mid) and Polisher 2 (large) is in operation, in order to comply with the 326 IAC 6-3-2 limit and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) limits.

Testing Requirements:

(1) Testing of the Hand Plasma Station, MG Dome Plasma Table, and the Sector Plasma Table for PM/PM10/PM2.5 is not required because the ACT5-20 Dust Collector and the Arcology cartridge filter are not required to comply with any applicable requirements.

(2) IDEM OAQ has determined that testing of the Polisher 1 (mid) and Polisher 2 (large) and the associated Hydrotron Air/Water Filtration control device is not required at this time to determine compliance with the PM emission limits in 326 IAC 6-3-2 or the metal HAP limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

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

<table>
<thead>
<tr>
<th>Control Device / Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrotron Air/Water Filtration Unit / Polisher 1 (mid) and Polisher 2 (large)</td>
<td>Pressure drop monitoring</td>
<td>Daily</td>
<td>Within normal range of 1.0 to 6.0 inches of water, unless a different upper or lower value is established in the most recent compliant stack test</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the Hydrotron Air/Water Filtration Unit for the Polisher 1 (mid) and Polisher 2 (large) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) limits.)
Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as bold text (these changes may include Title I changes):

1. Condition A.2 has been updated to include the new emission units.
2. Condition D.4 has been added to the permit to show the new minor HAP limits, 326 IAC 6-3-2 permit requirements, compliance determination and monitoring, and recordkeeping requirements.

A.2 Emission Units and Pollution Control Equipment Summary

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

(k) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2021 for construction, consisting of the following:

1. One (1) Hand Plasma Station, utilized to trim out the trailer heads as they are removed from the head press, with a maximum cutting rate of 318 inches per hour, controlled by an ACT5-20 Dust Collector, and exhausting indoors.

2. Two (2) Seamer TIG/MIG Welders, utilized to weld seams utilizing a common filler wire, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

3. Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and exhausting indoors.

4. One (1) MG Dome Plasma Table with an associated hand plasma cutter for part removal, utilized to cut parts, with a combined maximum cutting speed of 489.3 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

5. One (1) Sector Plasma Table, utilized to cut parts, with a maximum cutting speed of 30.0 inches per minute, controlled by an Arcology cartridge filter, and exhausting indoors.

6. Two (2) portable GMAW/GTAW welders, each with a maximum consumption of 1.0 pound of weld wire per hour, and exhausting indoors.

7. One (1) Seam Grinder, utilized to grind down or smooth out weld seams, with a maximum throughput rate of 4.0 parts per hour, and exhausting indoors.

...
Emissions Unit Description:

(k) One (1) Head Press operation that consists of pressing, cutting, grinding and polishing of carbon and stainless steel, approved in 2021 for construction, consisting of the following:

(3) Two (2) Polishers, identified as Polisher 1 (mid) and Polisher 2 (large), utilized to polish pressed Heads, each with a maximum metal removal rate of 10.0 pounds of metal per hour, controlled by a Hydrotron Air/Water Filtration unit, and 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 2-7-5(1)]

D.4.1 HAP Minor Limits [326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-4.1 (Major Source of HAPs) not applicable, the Permittee shall comply with the following emission limits for the two (2) polishers, identified as Polisher 1 (mid) and Polisher 2 (large):

(1) The combined chromium emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.

(2) The combined nickel emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 2.23 lb/hr.

(3) Combined total HAP emissions from Polisher 1 (mid) and Polisher 2 (large) shall not exceed 5.59 lb/hr.

Compliance with these limits shall limit the combined HAP emissions from these units to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) are rendered not applicable to the Polisher 1 (mid) and Polisher 2 (large).

D.4.2 Particulate Matter Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed the pounds per hour emission limitations when operating at the process weight rates shown below:

<table>
<thead>
<tr>
<th>Units</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Particulate Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polisher 1 (mid)</td>
<td>2.0</td>
<td>6.52</td>
</tr>
<tr>
<td>Polisher 2 (large)</td>
<td>2.0</td>
<td>6.52</td>
</tr>
</tbody>
</table>

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:

\[ E = \text{rate of emission in pounds per hour} \]
$P =$ process weight rate in tons per hour

**D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

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

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

**D.4.4 Particulate and HAPs Control**

In order to ensure compliance with Condition D.4.1 and D.4.2, the Hydrotron Air/Water Filtration Unit for particulate and HAP control shall be in operation to control emissions from Polisher 1 (mid) and Polisher 2 (large) at all times when the Polishers are in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

**D.4.5 Parametric Monitoring**

The Permittee shall record the pressure drop across the Hydrotron Air/Water Filtration Unit at least once per day when the associated Polisher 1 (mid) and Polisher 2 (large) are in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

**D.4.6 Broken or Failed Dust Collector Detection**

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with
abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

**D.4.7 Record Keeping Requirements**

(a) To document the compliance status with Condition D.4.5, the Permittee shall maintain daily records of pressure drop across the baghouse(s). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

These permit changes include model updates to standard permit language that are applicable to this source.

(1) Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.7 - Asbestos Abatement Projects of the permit has been revised as follows:

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

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

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

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 October 19, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 157-43422-00068. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 157-43401-00068.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.
(a) If you have any questions regarding this permit, please contact Michaela Hecox, 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) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

(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.
### Uncontrolled Potential to Emit (ton/year)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Degreasers</td>
<td>1.00</td>
<td>1.00</td>
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<td>0.00</td>
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### Sub-Total (Emissions)

- Emission Units with Integral Devices: 892.08 (PM), 809.21 (PM10), 808.99 (PM2.5), 1.13 (SO2), 23.22 (NOx), 1,645.55 (VOC), 20.09 (CO), 1,930.07 (Total HAPs).
- Total: 892.08 (PM), 809.21 (PM10), 808.99 (PM2.5), 1.13 (SO2), 23.22 (NOx), 1,645.55 (VOC), 20.09 (CO), 1,930.07 (Total HAPs).

### Emission Units with Integral Devices

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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<tr>
<td>Degreasers</td>
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<td>0.05</td>
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<tr>
<td>HP Dilution</td>
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<td>0.61</td>
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<tr>
<td>Steam Generator</td>
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<td>0.18</td>
<td>0.18</td>
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<td>0.18</td>
<td>0.18</td>
<td>0.54</td>
</tr>
</tbody>
</table>

### Total

- Total: 892.08 (PM), 809.21 (PM10), 808.99 (PM2.5), 1.13 (SO2), 23.22 (NOx), 1,645.55 (VOC), 20.09 (CO), 1,930.07 (Total HAPs).

Note: PM/PM10/PM2.5 emissions from the power coat operation (PB-12) were calculated after consideration of the controls based on the integral to the process determination.
### Table: Emissions Calculations

<table>
<thead>
<tr>
<th>Source Activities</th>
<th>Natural Gas Generator</th>
<th>HP Polisher 1</th>
<th>HP Polisher 2</th>
<th>HP Thermal Cutting</th>
<th>HP Welding</th>
<th>Total HAPs (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas</td>
<td>9.80</td>
<td>9.80</td>
<td>9.80</td>
<td>9.80</td>
<td>9.80</td>
<td>9.80</td>
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<tr>
<td>Total HAPs (tons/yr)</td>
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<td>99.20</td>
<td>99.20</td>
<td>99.20</td>
<td>99.20</td>
<td>99.20</td>
</tr>
</tbody>
</table>

Note: These are net controls and thus reduce HAPs. The 20% reduction includes the emissions of HAPs. This is reflected in the TCE after emission rates. Sources in bold are major HAP sources.

**Source:**Appendix A: Emissions Calculations

### Table: Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Source Activities</th>
<th>Natural Gas Generator</th>
<th>HP Polisher 1</th>
<th>HP Polisher 2</th>
<th>HP Thermal Cutting</th>
<th>HP Welding</th>
<th>Total HAPs (tons/yr)</th>
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<tbody>
<tr>
<td>Natural Gas</td>
<td>9.80</td>
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</tbody>
</table>

Note: These are net controls and thus reduce HAPs. The 20% reduction includes the emissions of HAPs. This is reflected in the TCE after emission rates. Sources in bold are major HAP sources.

**Source:**Appendix A: Emissions Calculations
Appendix A: Emissions Calculations
Modification Summary

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

Uncontrolled Potential to Emit (tons/yr) - Part 70 Determination

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>HP Thermal Cutting</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.19</td>
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<tr>
<td>HP Welding Operations</td>
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<td>-</td>
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</tr>
<tr>
<td>HP Polisher 1 (mid)</td>
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<tr>
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<tr>
<td>HP Seam Grinder</td>
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<td>0.00</td>
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<td><strong>63.33</strong></td>
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</table>

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr) - Part 70 Determination

<table>
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<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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</thead>
<tbody>
<tr>
<td>HP Thermal Cutting</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>0.19</td>
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<tr>
<td>HP Welding Operations</td>
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<td>0.06</td>
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<td>-</td>
<td>-</td>
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<tr>
<td>HP Polisher 1 (mid)</td>
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<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>HP Seam Grinder</td>
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<td>0.00</td>
<td><strong>24.71</strong></td>
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</table>

* PM2.5 listed is direct PM2.5

Note: Shaded cells indicate where limits are included.
### Emissions Calculations

#### AeroSkirt Machining-Drilling

**Company Name:** Wabash National Corporation (South)

**Address City IN Zip:** Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068

**TV SSM No.:** 157-43422-00068

**Reviewer:** Michaela Hecox

**Date:** 11/12/2020

#### AeroSkirt Material Removal

<table>
<thead>
<tr>
<th>Product</th>
<th>Panel Weight (lbs)</th>
<th>Material</th>
<th>Panel Surface Area (in²)</th>
<th>Hole Dia (in)</th>
<th>Hole Surface Area (in²)</th>
<th># of Holes Drilled</th>
<th>Percentage of Material Removed</th>
<th>Weight of Material Removed/pan (lbs)</th>
<th>Panels per Hour</th>
<th>Material Removed per Hour (lbs/hr)</th>
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<td>Ventix DRS</td>
<td>20</td>
<td>GRP</td>
<td>4104</td>
<td>0.247</td>
<td>0.048</td>
<td>4</td>
<td>0.005%</td>
<td>0.0009</td>
<td>15</td>
<td>0.014</td>
</tr>
<tr>
<td>AeroFin</td>
<td>32</td>
<td>GRP</td>
<td>5104</td>
<td>0.247</td>
<td>0.048</td>
<td>4</td>
<td>0.004%</td>
<td>0.0012</td>
<td>15</td>
<td>0.018</td>
</tr>
</tbody>
</table>

#### 20’ PSC Material Removal

<table>
<thead>
<tr>
<th>Material</th>
<th>Hole Dia (in)</th>
<th>Number of Holes</th>
<th>Volume Removed per Unit (in³)</th>
<th>Density (lb/in³)</th>
<th>Weight of Material Removed (lb)</th>
<th>Units per Hour</th>
<th>Material Removed per Hour (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duraplate</td>
<td>0.247</td>
<td>218</td>
<td>2.507</td>
<td>0.06</td>
<td>0.150</td>
<td>1</td>
<td>0.150</td>
</tr>
<tr>
<td></td>
<td>0.438</td>
<td>24</td>
<td>0.866</td>
<td>0.06</td>
<td>0.052</td>
<td>1</td>
<td>0.052</td>
</tr>
<tr>
<td>Steel</td>
<td>0.247</td>
<td>80</td>
<td>0.958</td>
<td>0.28</td>
<td>0.268</td>
<td>1</td>
<td>0.268</td>
</tr>
<tr>
<td>Plywood</td>
<td>0.247</td>
<td>64</td>
<td>0.367</td>
<td>0.10</td>
<td>0.031</td>
<td>1</td>
<td>0.031</td>
</tr>
<tr>
<td>Aluminum</td>
<td>0.247</td>
<td>510</td>
<td>2.444</td>
<td>0.10</td>
<td>0.244</td>
<td>4</td>
<td>0.977</td>
</tr>
</tbody>
</table>

#### Emission Factors

<table>
<thead>
<tr>
<th>Type of Operation</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM10 Emission Factor (lb/ton)</th>
<th>PM2.5 Emission Factor (lb/ton)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fine Milling &amp; Machining</td>
<td>6.00</td>
<td>3.00</td>
<td>1.11</td>
</tr>
</tbody>
</table>

#### PM Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Material Removed (tons/yr)</th>
<th>Material Removed (tons/yr)</th>
<th>PM Emissions (tons/yr)</th>
<th>PM10 Emissions (tons/yr)</th>
<th>PM2.5 Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duraplate</td>
<td>1.964</td>
<td>8.60</td>
<td>6.00</td>
<td>3.00</td>
<td>1.11</td>
</tr>
<tr>
<td>GRP</td>
<td>0.867</td>
<td>3.80</td>
<td>6.00</td>
<td>3.00</td>
<td>1.11</td>
</tr>
<tr>
<td>Steel</td>
<td>0.286</td>
<td>1.18</td>
<td>6.00</td>
<td>3.00</td>
<td>1.11</td>
</tr>
<tr>
<td>Plywood</td>
<td>0.057</td>
<td>0.25</td>
<td>6.00</td>
<td>3.00</td>
<td>1.11</td>
</tr>
<tr>
<td>Total</td>
<td>18.24</td>
<td>0.05</td>
<td>0.03</td>
<td>0.01</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Methodology**

Wood Working Emission Factors for Millwork Dry Wood (<12% Moisture Content) by South Carolina Department of Health and the Environmental Control SCDHEC

http://www.scdhec.gov/environment/AirQuality/RegistrationPermits/WoodWorking/

Wood Working Emissions Estimator - Wood Throughput


Basis for Wood Fine Milling & Machining (Fine Sawing, Sanding)
Appendix A: Emissions Calculations

SikaFast Bonding

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

Emission Factors

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Gallon of Material (gal/unit)</th>
<th>Maximum Units/Day</th>
<th>Maximum Units/Day</th>
<th>VOC (Lb/Gal)</th>
<th>LBS/Hour</th>
<th>LBS/Day</th>
<th>Tons/Year</th>
<th>Tons/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck Boxes</td>
<td>Worst Case Caulk</td>
<td>0.07</td>
<td>60.00</td>
<td>0.15</td>
<td>0.03</td>
<td>0.63</td>
<td>0.11</td>
<td>0.03</td>
<td></td>
</tr>
<tr>
<td>Portable Storage Containers</td>
<td>Worst Case Caulk</td>
<td>0.22</td>
<td>16.80</td>
<td>0.15</td>
<td>0.02</td>
<td>0.55</td>
<td>0.10</td>
<td>0.03</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>0.05</strong></td>
<td><strong>1.18</strong></td>
<td><strong>0.22</strong></td>
<td><strong>0.06</strong></td>
<td></td>
</tr>
</tbody>
</table>

* SikaFast 3121 is composed by two products: Part A and Part B. Part A does not contain HAPs. Part B contains 53% of HAPs.

Assuming that the final product contains equal parts of Part A and Part B product, the HAP content of SikaFast 3121 is = VOC emissions (Ton/yr) x 0.53 / 2.

**METHODOLOGY**

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

---

<table>
<thead>
<tr>
<th>SikaFast 3081</th>
<th>VOC Emission Factors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description</td>
<td>Density (lb/gal)</td>
</tr>
<tr>
<td>SikaFast As Applied</td>
<td>8.30</td>
</tr>
</tbody>
</table>

Product Data Sheet
## Appendix A: Emissions Calculations

**Wire Welding Lincoln L-56**

**Company Name:** Wabash National Corporation (South)  
**Address:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909  
**TV SPM No.:** 157-43401-00068  
**TV SSM No.:** 157-43422-00068  
**Reviewer:** Michaela Hecox  
**Date:** 11/12/2020

### Emission Factors

<table>
<thead>
<tr>
<th>PM = PM10</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td>L-56 Weld Wire</td>
<td>10</td>
<td>0.0241</td>
<td>0.02</td>
</tr>
</tbody>
</table>

**EMISSION TOTALS**

<table>
<thead>
<tr>
<th>Potential Emissions lbs/hr</th>
<th>PM = PM10</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.24</td>
<td>0.20</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential Emissions lbs/day</th>
<th>PM = PM10</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5.78</td>
<td>4.80</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential Emissions tons/year</th>
<th>PM = PM10</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.06</td>
<td>0.88</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process Welding</th>
<th>Maximum Electrode Consumption (lbs / hr)</th>
<th>Emission Factors* (lb pollutant/lb electrode)</th>
<th>Emissions (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>L-56 Weld Wire</td>
<td>10</td>
<td>0.241 0.02 0.241 0.200 0.200 0.200</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Methodology

- **Welding emissions, lbs/hr:** \((\text{max. lbs of electrode used/hr})(\text{emission factor, lb pollutant/lb of electrode used})\)
- **Emissions, lbs/day:** \(\text{emissions, lbs/hr} \times 24 \text{ hrs/day}\)
- **Emissions, tons/yr:** \(\text{emissions, lbs/hr} \times 8,760 \text{ hrs/year} \times 1 \text{ ton/2,000}\)

*Mn Emission Factor L-56 specific based on SDS provided by the source (wt % Manganese value)."
### Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

**Potential to Emit Before Control**

- Flow rate of actual abrasive (lb/hr) = 3000 lb/hr (per nozzle)
- Fraction of time of wet blasting = 0%
- Number of nozzles = 1
- PM emission factor for actual abrasive from Table 1 = 0.010 lb PM/ lb abrasive
- PM10 emission factor ratio for actual abrasive from Table 1 = 0.70 lb PM10 / lb PM

\[
\text{Potential to Emit (before control)} = \text{EF} \times \text{FR} \times (1 - \frac{w}{200}) \times N
\]

\[
\begin{align*}
\text{PM} & = 30.00 \\
\text{PM10} & = 21.00 \\
\text{lb/hr} & = 720.00 \\
\text{lb/day} & = 504.00 \\
\text{ton/yr} & = 131.40 \\
\end{align*}
\]

**Potential to Emit After Control**

- Emission Control Device Efficiency = 99.0% 99.0%

\[
\text{Potential to Emit (after control)} = \left[ \text{Potential to Emit (before control)} \right] \times \left[ 1 - \text{control efficiency} \right]
\]

\[
\begin{align*}
\text{PM} & = 0.30 \\
\text{PM10} & = 0.21 \\
\text{lb/hr} & = 7.20 \\
\text{lb/day} & = 5.04 \\
\text{ton/yr} & = 1.31 \\
\end{align*}
\]

**METHODOLOGY**


- Potential to Emit (before control) = \( \text{EF} \times \text{FR} \times (1 - \frac{w}{200}) \times N \) (where w should be entered in as a whole number (if w is 50%, enter 50))
- Potential to Emit (after control) = \( \left[ \text{Potential to Emit (before control)} \right] \times \left[ 1 - \text{control efficiency} \right] \)
- Potential to Emit (tons/year) = \( \left[ \text{Potential to Emit (lbs/hour)} \right] \times [8760 \text{ hours/year}] \times [\text{ton/2000 lbs}] \)

The controlled limits shall meet the requirements of 326 IAC 6-3-2
### Appendix A: Emissions Calculations

**OV-1**

**Company Name:** Wabash National Corporation (South)

**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN  47909

**TV SPM No.:** 157-43401-00068

**TV SSM No.:** 157-43422-00068

**Reviewer:** Michaela Hecox

**Date:** 11/12/2020

**Heat Input Capacity**

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5</td>
<td>1020</td>
</tr>
</tbody>
</table>

One (1) Natural Gas Bake Oven OV-1 rated at 1.5 MMBtu/hr

<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>0.05</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.05</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>3.86E-03</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.64</td>
</tr>
<tr>
<td>NOx</td>
<td>100.0 <strong>see below</strong></td>
<td>0.04</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.54</td>
</tr>
<tr>
<td>CO</td>
<td>84.0</td>
<td></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.

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMcf</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>-1.2E-03</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>1.35E-05</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>7.73E-06</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>4.83E-04</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.16E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>2.19E-05</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMcf</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>3.22E-06</td>
</tr>
<tr>
<td>Cadmium</td>
<td>7.09E-06</td>
</tr>
<tr>
<td>Chromium</td>
<td>9.02E-06</td>
</tr>
<tr>
<td>Manganese</td>
<td>2.45E-06</td>
</tr>
<tr>
<td>Nickel</td>
<td>1.35E-05</td>
</tr>
</tbody>
</table>

**Total HAPs (tpy)** 0.01

**Methodology**

All emission factors are based on normal firing.

**MMBtu = 1,000,000 Btu**

**MMCF = 1,000,000 Cubic Feet of Gas**

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

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

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

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

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).
# Appendix A: Emissions Calculations

**PB-12**

**Company Name:** Wabash National Corporation (South)

**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068

**TV SSM No.:** 157-43422-00068

**Reviewer:** Michaela Hecox

**Date:** 11/12/2020

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Coating Density (lb/gal)</th>
<th>Max. Usage Rate (lb/unit)</th>
<th>Max. Throughput (units/hr)</th>
<th>Coating Usage (lb/hr)</th>
<th>Transfer Efficiency</th>
<th>Solids Content</th>
<th>Process Control Efficiency</th>
<th>PM/PM 2.5/PM 10 (lb/hr)</th>
<th>PM/PM 2.5/PM 10 (tons/year)</th>
<th>PM/PM 2.5/PM 10 (lb/hr)</th>
<th>PM/PM 2.5/PM 10 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PB-12</td>
<td>13.27</td>
<td>11</td>
<td>4</td>
<td>44</td>
<td>60.00%</td>
<td>100.00%</td>
<td>99.99%</td>
<td>17.60</td>
<td>77.09</td>
<td>1.76E-03</td>
<td>7.71E-03</td>
</tr>
</tbody>
</table>

**Notes:**

The powders are collected by the filter and recycled to the process.

Transfer efficiency for coating flat surface using electrostatic air atomized. (AP-42, pages 859-861)

PTE of PM/PM2.5/PM10 (before integral controls (lb/hr)) = (Coating Usage) * (Solids Content) * (1-Transfer Efficiency)

PTE of PM/PM2.5/PM10 (before integral controls (tons/year)) = (Coating Usage) * (Solids Content) * (1-Transfer Efficiency) * 8760/2000

PTE of PM/PM2.5/PM10 (after integral controls (lb/hr)) = (Coating Usage) * (Solids Content) * (1-Transfer Efficiency) * (1-Process Control Efficiency)

PTE of PM/PM2.5/PM10 (after integral controls (tons/year)) = (Coating Usage) * (Solids Content) * (1-Transfer Efficiency) * (1-Process Control Efficiency) * 8760/2000

* The filters for control should be considered an integral part of the process. PTE should be calculated from the After Controls values.
# Appendix A: Emissions Calculations

## Coatings

### Company Name:
Webash National Corporation (South)

### Address City IN Zip:
3550 Veterans Memorial Parkway South, Lafayette, IN 47909

### TV SPM No.:
157-43401-00068

### TV SSM No.:
157-43422-00068

### Reviewer:
Michaela Hecox

### Date:
11/12/2020

Over the 8-2-9 limit of 3.5 lb/gallon

### Worst case lb/gallon

<table>
<thead>
<tr>
<th>Product Name / Description</th>
<th>Product Number</th>
<th>Density Lbs per Gal</th>
<th>VOC Content % by Weight</th>
<th>VOC (lb/gal)</th>
<th>Xylene % by Weight</th>
<th>Xylene (lb/gal)</th>
<th>Ethylbenzene % by Weight</th>
<th>Ethylbenzene (lb/gal)</th>
<th>Cobalt Compounds % by Weight</th>
<th>Cobalt Compounds (lb/gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isocyanate Solution</td>
<td>CTC1116</td>
<td>9.11</td>
<td>14.06</td>
<td>1.46</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Duraspire 430 Cretes Red</td>
<td>AAWR623</td>
<td>9.5</td>
<td>34.59</td>
<td>3.39</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.08</td>
</tr>
<tr>
<td>R-Cure 800 Wabash Dup3058 Premium Shadow Red</td>
<td>KPR0865</td>
<td>8.72</td>
<td>32.38</td>
<td>2.62</td>
<td>0.33</td>
<td>0.03</td>
<td>0.07</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
</tr>
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Max (excluding Thompson's Water Seal) | 13.52 | 100.00 | 7.310 | 40 | 2.924 | 15.00 | 1.097 | 0.10 | 0.009 |

### Appendix A: Emissions Calculations

**Coatings**
## Appendix A: Emissions Calculations

### Coatings

<table>
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<tr>
<th>Product Name / Description</th>
<th>Product Number</th>
<th>Density Lbs per Gal</th>
<th>Naphthalene % by Weight</th>
<th>Naphthalene (lb/gal)</th>
<th>Cumene % by Weight</th>
<th>Cumene (lb/gal)</th>
<th>Toluen e % by Weight</th>
<th>Toluen e (lb/gal)</th>
<th>Manganese % by Weight</th>
<th>Manganese (lb/gal)</th>
<th>Glycol Compounds % by Weight</th>
<th>Over the 8-2-9 limit of 3.5 lb/gallon</th>
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Max (excluding Thompsons Water Seal)         | 13.52          | 0.61               | 0.075                   | 0.18                | 0.016              | 48.00          | 0.12                 | 0.012            | 5.00                 | 0.00             | 0.00                          | 0.00                                     |

**Note:** The table lists the product names, product numbers, density, and other properties of various coatings used in the calculations. The values reflect the emissions and properties of each coating, with particular attention to the over the 8-2-9 limit of 3.5 lb/gallon scenario.
## Appendix A: Emissions Calculations

### Coatings

**Company Name:** Wabash National Corporation (South)  
**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Laf  
**TV SPM No.:** 157-43401-00068  
**TV SSM No.:** 157-43422-00068  
**Reviewer:** Michaela Hecox  
**Date:** 11/12/2020

### Over the 8-2-9 limit of 3.5 lb/gallon

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<th>Product Name / Description</th>
<th>Product Number</th>
<th>Density Lbs per Gal</th>
<th>Glycol Compounds (lb/gal)</th>
<th>Methyl Isobutyl Ketone % by Weight</th>
<th>Methyl Isobutyl Ketone (lb/gal)</th>
<th>Formaldehyde % by Weight</th>
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## Appendix A: Emissions Calculations

### Paintbooths

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<td>15.85</td>
<td>17.84</td>
<td>0.12</td>
<td>0.57</td>
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<tr>
<td>PB2</td>
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<td>3.57</td>
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<td>PB3</td>
<td>WORST CASE COATING</td>
<td>14.41</td>
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<td>0.37</td>
<td>0.08</td>
<td>16.21</td>
<td>0.06</td>
<td>2.38</td>
<td>2.68</td>
<td>0.02</td>
<td>0.09</td>
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<td>Solvent - Xylene</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>2.68</td>
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<td>PB11 EMISSIONS</td>
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<td>0.00</td>
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</tr>
<tr>
<td>PB3</td>
<td>Solvent - Xylene</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PB8</td>
<td>WORST CASE COATING</td>
<td>19.21</td>
<td>7.20</td>
<td>0.06</td>
<td>0.49</td>
<td>0.10</td>
<td>21.61</td>
<td>0.08</td>
<td>3.17</td>
<td>3.57</td>
<td>0.02</td>
<td>0.11</td>
</tr>
<tr>
<td>PB8</td>
<td>Solvent - Xylene</td>
<td>0.63</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PB9</td>
<td>WORST CASE COATING</td>
<td>14.41</td>
<td>5.40</td>
<td>0.04</td>
<td>0.37</td>
<td>0.08</td>
<td>16.21</td>
<td>0.06</td>
<td>2.38</td>
<td>2.68</td>
<td>0.02</td>
<td>0.09</td>
</tr>
<tr>
<td>PB9</td>
<td>Solvent - Xylene</td>
<td>0.31</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

### METHODOLOGY

- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

### Total HAPs (tpy)

<table>
<thead>
<tr>
<th>Material</th>
<th>Xylene</th>
<th>Ethylbenzene</th>
<th>Toluene</th>
<th>Cumene</th>
<th>Toluene</th>
<th>Manganese</th>
<th>Glycol Compounds</th>
<th>Methyl Isobutyl Ketone</th>
<th>Formaldehyde</th>
<th>Hexamethylene Diisocyanate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>638.90</td>
<td>253.36</td>
<td>1.87</td>
<td>16.10</td>
<td>3.27</td>
<td>709.79</td>
<td>2.48</td>
<td>100.02</td>
<td>116.53</td>
<td>0.80</td>
</tr>
<tr>
<td></td>
<td>1827.42</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations

Abrasives Blasting - Unit BB-5

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft3)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Calculations

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table

D = Density of abrasive (lb/ft3) From Table 2 = 99
D1 = Density of sand (lb/ft3) = 487 steel shot

Flow Rate (FR) (lb/hr) = 4451.869 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 = 0.004
FR = Flow Rate (lb/hr) = 4451.869
W = fraction of time of wet blasting = 0.0%
N = number of nozzles = 4

99.0%

Uncontrolled Emissions = 71.23 lb/hr
PM = 311.99 ton/yr
PM10/PM2.5= 61.26 lb/hr

Controlled Emissions = 0.71 lb/hr
PM = 3.12 ton/yr
PM10/PM2.5= 0.61 lb/hr

METHODOLOGY


E = EF x FR x (1-w/200) x N

The controlled limits shall meet the requirements of 326 IAC 6-3-2
### Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

### Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
</tbody>
</table>

### Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Pressure (psig)</th>
<th>Internal diameter, in</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>30</td>
</tr>
<tr>
<td>1/8</td>
<td>28</td>
</tr>
<tr>
<td>3/16</td>
<td>65</td>
</tr>
<tr>
<td>1/4</td>
<td>109</td>
</tr>
<tr>
<td>5/16</td>
<td>205</td>
</tr>
<tr>
<td>3/8</td>
<td>285</td>
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<tr>
<td>7/16</td>
<td>385</td>
</tr>
<tr>
<td>1/2</td>
<td>503</td>
</tr>
<tr>
<td>5/8</td>
<td>820</td>
</tr>
<tr>
<td>3/4</td>
<td>1140</td>
</tr>
<tr>
<td>1</td>
<td>2030</td>
</tr>
</tbody>
</table>

### Calculations

**Adjusting Flow Rates for Different Abrasives and Nozzle Diameters**

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

Flow Rate (FR) = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 = 149

D = Density of abrasive (lb/ft³) From Table 2 = 487

D1 = Density of sand (lb/ft³) = 99

ID = Actual nozzle internal diameter (in) = 0.1875

ID1 = Nozzle internal diameter (in) from Table 3 = 0.1875

Flow Rate (FR) (lb/hr) = 732.960 per nozzle

Uncontrolled Emissions (E, lb/hr)

E = emission factor (lb PM/ lb abrasive) From Table 1 = 0.004

Flow Rate (FR) (lb/hr) = 732.960

w = fraction of time of wet blasting = 0%

N = number of nozzles = 1

Uncontrolled Emissions * 2.93 lb/hr

12.84 ton/yr PM10/ PM2.5 11.04 ton/yr

Baghouse Efficiency 98.00%

Controlled Emissions * 0.06 ton/yr PM10/ PM2.5 0.05 ton/yr

### METHODOLOGY


Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

The controlled limits shall meet the requirements of 326 IAC 6-3-2
## Appendix A: Emissions Calculations

### Caulking Operation

**Company Name:** Wabash National Corporation (South)  
**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068  
**TV SSM No.:** 157-43422-00068  
**Reviewer:** Michaela Hecox  
**Date:** 11/12/2020

### Emission Unit Material Density (Lb/Gal) Weight % Volatile (H20 & Organics) Weight % Water Weight % Organics Volume % Water Volume % Non-Volatiles (solids) Gal of Mat. (gal/unit) Maximum (unit/day) Pounds VOC per gallon of coating less water

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caulking Operation</td>
<td>Sika Flex 227</td>
<td>10.60</td>
<td>0.04</td>
<td>0.00</td>
<td>0.04</td>
<td>0.00</td>
<td>0.96</td>
<td>0.54</td>
<td>80.00</td>
<td>0.41</td>
</tr>
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</table>

### HAP Calculations

**Density (lb/gal)**  
**Gallons of Material (gal/unit)**  
**Maximum (units/day)**  
**Weight % Xylene**  
**Weight % Methylene diphenyl disiocyanate (MDI)**  
**Combined HAPs %**  
**Xylene Emissions (ton/yr)**  
**Methylene diphenyl disiocyanate (MDI) Emissions (ton/yr)**  
**Combined HAPs Emissions (ton/yr)**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (units/day)</th>
<th>Weight % Xylene</th>
<th>Weight % Methylene diphenyl disiocyanate (MDI)</th>
<th>Combined HAPs %**</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Methylenediisocyanate Emissions (ton/yr)</th>
<th>Combined HAPs Emissions (ton/yr)</th>
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<tbody>
<tr>
<td>Caulking Operation</td>
<td>SIKA Brand of Caulks (various (Seal))</td>
<td>10.60</td>
<td>0.539</td>
<td>80.00</td>
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<td>0.04</td>
<td>3.34</td>
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<td>3.34</td>
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<td>Caulking Operation</td>
<td>Sika Flex 255-FC Black 10oz</td>
<td>10.80</td>
<td>0.003</td>
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<td>0.06</td>
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<td>0.07</td>
<td>0.03</td>
<td>2.60E-03</td>
<td>0.03</td>
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</table>

### Notes

*Note: This is "as applied" based on the calculations provided by the source and verified by IDEM.  
**Note: Combined HAPs % is based on worst case scenario.

### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)  
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

### Emission Unit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Cleaning</td>
<td>Solvent - Xylene</td>
<td>7.26</td>
<td>1.00</td>
<td>0.00</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.08</td>
<td>2.50</td>
<td>7.26</td>
</tr>
</tbody>
</table>

**State Potential Emissions**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC (lbs/hour)</th>
<th>Potential VOC (tons/year)</th>
<th>PM Potential before Controls (ton/yr)</th>
<th>PM10 Potential before Controls (ton/yr)</th>
<th>PM2.5 Potential before Controls (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Cleaning</td>
<td>Solvent - Xylene</td>
<td>7.26</td>
<td>1.45</td>
<td>34.85</td>
<td>6.36</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
</tbody>
</table>

### HAP Calculations:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (units/day)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethyl Benzene</th>
<th>Combined HAPs %**</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Ethyl Benzene (ton/yr)</th>
<th>Combined HAPs (ton/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Cleaning</td>
<td>Xylene</td>
<td>7.26</td>
<td>0.08</td>
<td>60.00</td>
<td>0.85</td>
<td>0.15</td>
<td>100%</td>
<td>5.40</td>
<td>0.95</td>
<td>6.36</td>
</tr>
</tbody>
</table>

Total State Potential Emissions: 5.40 0.95 6.36

*Note: This is "as applied" based on the calculations provided by the source and verified by IDEM.

**Note: Combined HAPs % is based on worst case scenario.

**METHODODOLOGY**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
- HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

**VOC and Particulate**

**From Surface Coating Operations**

**Company Name:** Wabash National Corporation (South)

**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068

**TV SSM No.:** 157-43422-00068

**Reviewer:** Michaela Hecox

**Date:** 11/12/2020

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decal Application Operation</td>
<td>3M Primer #94 Decal Adhesive</td>
<td>6.84</td>
<td>0.94</td>
<td>0.00</td>
<td>94.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.10</td>
<td>2.500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit Operation</th>
<th>Material</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC (lbs/hour)</th>
<th>Potential VOC (lbs/day)</th>
<th>Potential VOC (tons/year)</th>
<th>PM Potential before Controls (ton/yr)</th>
<th>PM10 Potential before Controls (ton/yr)</th>
<th>PM2.5 Potential before Controls (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decal Application Operation</td>
<td>3M Primer #94 Decal Adhesive</td>
<td>6.43</td>
<td>6.43</td>
<td>1.61</td>
<td>38.60</td>
<td>7.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
</tbody>
</table>

**State Potential Emissions**

|                      | 1.61 | 38.60 | 7.04 | 0.00 | 0.00 | 0.00 | 100% |

**METHODOLOGY**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
## Appendix A: Emissions Calculations

### Head Press Operation

#### Polisher 1 and Polisher 2

**Company Name:** Wabash National Corporation (South)

**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068

**TV SSM No.:** 157-43422-00068

**Reviewer:** Michaela Hecox

**Date:** 11/12/2020

### PROCESS HAPS (lbs/hr)

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Number of Parts per Hour</th>
<th>Max. Metal Material Removal (Lbs/part)</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>Mn</th>
<th>Co</th>
<th>Se</th>
<th>Ni</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sanding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polisher 1 (Mid)</td>
<td>1</td>
<td>2.0</td>
<td>5.0</td>
<td>1.000</td>
<td>1.000</td>
<td>1.000</td>
<td>10.00%</td>
<td>0.75%</td>
<td>0.30%</td>
<td>34.00%</td>
<td>27.00%</td>
</tr>
<tr>
<td>Polisher 2 (Large)</td>
<td>1</td>
<td>2.0</td>
<td>5.0</td>
<td>1.000</td>
<td>1.000</td>
<td>1.000</td>
<td>10.00%</td>
<td>0.75%</td>
<td>0.30%</td>
<td>34.00%</td>
<td>27.00%</td>
</tr>
</tbody>
</table>

### Potential Emissions tons/year

<table>
<thead>
<tr>
<th></th>
<th>87.60</th>
<th>87.60</th>
<th>87.60</th>
<th>8.76</th>
<th>0.66</th>
<th>0.26</th>
<th>29.78</th>
<th>23.65</th>
<th>63.12</th>
</tr>
</thead>
</table>

### Controlled Emissions tons/year

|                  | Assume 70.00% Control | 26.28 | 26.28 | 26.28 | 2.63 | 0.20 | 0.08 | 8.94 | 7.10 | 18.93 |

### Methodology:

- **Max. Metal Material Removal (lbs/hr)** based on a mass balance study done by the source.
- **Percent HAP based on MSDS for stainless steel.**
- **PM/PM10/PM2.5 Emissions (lbs/hr) = assume 100% of material removed is PM/PM10/PM2.5**
- **HAP Emissions (lbs/hr) = Max. Metal Material Removal (lbs/hr) x percent HAP**
- **Potential Emissions (tons/yr) = emissions, lbs/hr x 8,760 hrs/year x 1 ton/2,000 lbs.**
- **Controlled Emissions (tons/yr) = Potential Emissions (tons/yr) x (1 - Control Efficiency)**
Appendix A: Emissions Calculations

Head Press Operation

Thermal Cutting

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

<table>
<thead>
<tr>
<th>FLAME CUTTING</th>
<th>Number of Stations</th>
<th>Max. Metal Thickness Cut (in.)</th>
<th>Max. Metal Cutting Rate (in/hr)</th>
<th>EMISSION FACTORS (lb pollutant/1,000 inches cut, 1&quot; thick)**</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5  Mn Co Se Ni Cr PM/PM10/PM2.5  Mn Co Se Ni Cr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand Plasma***</td>
<td>1</td>
<td>0.50</td>
<td>318</td>
<td>0.0039 10.00% 0.75% 0.30% 34.00% 27.00% 5.6E-03 4.65E-05 4.65E-06 1.6E-05 2.1E-04 1.4E-04</td>
<td>6.2E-04</td>
<td>4.4E-04</td>
</tr>
<tr>
<td>MG (Dome) Plasma Table Turret**</td>
<td>1</td>
<td>0.50</td>
<td>484</td>
<td>0.0039 10.00% 0.75% 0.30% 34.00% 27.00% 5.6E-03 4.65E-05 4.65E-06 1.6E-05 2.1E-04 1.4E-04</td>
<td>6.2E-04</td>
<td>4.4E-04</td>
</tr>
<tr>
<td>Hand Plasma Cutter (Scrap Cutting)</td>
<td>1</td>
<td>0.50</td>
<td>5.3</td>
<td>0.0039 10.00% 0.75% 0.30% 34.00% 27.00% 5.6E-03 4.65E-05 4.65E-06 1.6E-05 2.1E-04 1.4E-04</td>
<td>6.2E-04</td>
<td>4.4E-04</td>
</tr>
<tr>
<td>Sector Plasma Turret**</td>
<td>1</td>
<td>0.50</td>
<td>30</td>
<td>0.0039 10.00% 0.75% 0.30% 34.00% 27.00% 5.6E-03 4.65E-05 4.65E-06 1.6E-05 2.1E-04 1.4E-04</td>
<td>6.2E-04</td>
<td>4.4E-04</td>
</tr>
</tbody>
</table>

EMISSION TOTALS

Potential Emissions lbs/hr 6.14E-02 8.14E-03 4.60E-04 1.64E-04 2.09E-02 1.6D-02 4.42E-02
Potential Emissions lbs/day 1.47 1.47E-01 1.10E-02 4.42E-03 5.01E-01 3.98E-01 1.06
Potential Emissions tons/year 2.69E-01 2.69E-02 2.62E-03 8.07E-04 9.14E-02 7.26E-02 1.94E-01

Methodology:

Percent HAP based on MSDS for stainless steel.

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

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

*** The Hand Plasma is utilized to trim out the formed head from the surrounding material. The worst case for this unit will be 1/2 inch (0.50) material, with a Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick) Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick) Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

Controlled Emissions (tons/yr) = Potential Emissions (tons/yr) x (1 - Control Efficiency)
## Appendix A: Emissions Calculations
### Seam Grinder
#### Head Press Operation

**Company Name:** Wabash National Corporation (South)
**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
**TV SPM No.:** 157-43401-00068
**TV SSM No.:** 157-43422-00068
**Reviewer:** Michaela Hecox
**Date:** #####

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Number of Parts per Hour</th>
<th>Max. Metal Material Removal (Lbs/part)</th>
<th>EMISSION FACTORS (Weld Wire Factors)</th>
<th>EMISSIONS</th>
<th>HAPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sanding</td>
<td></td>
<td></td>
<td></td>
<td>PM                         PM10  PM2.5 Mn Ni Cr PM PM10 PM2.5 Mn Ni Cr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Seam Grinder</td>
<td>1</td>
<td>4</td>
<td>0.056</td>
<td>1 1 1 0.000245 0.000226 0.000528 2.24E-01 2.24E-01 2.24E-01 5.49E-05 5.06E-05 1.18E-04 2.24E-04</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Methodology:
- Max. Metal Material Removal (lbs/hr) based on a mass balance study done by the source.
- Percent HAP based on SDS for stainless steel.
- PM/PM10/PM2.5 Emissions (lb/hr) = assume 100% of material removed is PM/PM10/PM2.5
- HAP Emissions (lbs/hr) = Max. Metal Material Removal (lbs/hr) x percent HAP
- Potential Emissions (tons/yr) = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
- Controlled Emissions (tons/yr) = Potential Emissions (tons/yr) x (1 - Control Efficiency)
### METHODOLOGY

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

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

Using AWS average values: 
\[
\text{Emission factor} = \frac{0.25 \text{ g/min}}{3.6 \text{ m/min}} \times \frac{39.37 \text{ in./m}}{1000 \text{ in.}} \times 0.0039 \text{ lb/in.} = 0.0022 \text{ lb/g,} \\
\text{Plasma cutting emissions, lb/hr: } (# \text{ of stations})(\text{max. cutting rate, in./min.})(60 \text{ min./hr.})(\text{emission factor, lb pollutant/1,000 in. cut, 8 mm thick})
\]

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

**Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting".**

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.
Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>Max. electrode consumption per station (lbs/day)</th>
<th>Process</th>
<th>Max. electrode consumption per station (tons/hr)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal Inert Gas (MIG) (carbon steel)</td>
<td>122</td>
<td>1.1</td>
<td>26.4</td>
<td>5.50E-04</td>
<td>7.38E-01</td>
<td>7.38E-01</td>
<td>7.38E-01</td>
</tr>
<tr>
<td>Stick (E7018 electrode)</td>
<td>8</td>
<td>1.1</td>
<td>26.4</td>
<td>5.50E-04</td>
<td>1.86E-01</td>
<td>1.86E-01</td>
<td>1.86E-01</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG) (carbon steel)</td>
<td>2</td>
<td>1.1</td>
<td>26.4</td>
<td>5.50E-04</td>
<td>2.12E-02</td>
<td>2.12E-02</td>
<td>2.12E-02</td>
</tr>
<tr>
<td>Wire (ER70S-6)</td>
<td>1</td>
<td>125</td>
<td>3000</td>
<td>6.25E-02</td>
<td>6.50E-01</td>
<td>6.50E-01</td>
<td>6.50E-01</td>
</tr>
<tr>
<td>Wire (L-56)</td>
<td>1</td>
<td>10</td>
<td>240</td>
<td>5.00E-03</td>
<td>2.41E-01</td>
<td>2.41E-01</td>
<td>2.41E-01</td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

Emissions, lbs/day = emissions, lb/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/yr x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". Refer to AP-42, Chapter 12.19 for additional emission factors for welding.
### METHODOLOGY

Assume all PM emissions are equal to PM10/PM2.5

The baghouse specifications for DC1 are from Page 3 of 3, TSD Appendix A for permit no.: 039-16024-00556, issued April 23, 2003.

#### After Control

After Control

\[
PTE \text{ of PM/PM10 (lbs/hour)} = \text{Air Flow Rate (acfm)} \times \text{Outlet Grain Loading (gr/dscf)} \times 60 \text{ minutes/hour} \times \frac{1 \text{ lb}}{7000 \text{ grains}}
\]

\[
PTE \text{ of PM/PM10 (tons/year)} = \text{Air Flow Rate (acfm)} \times \text{Outlet Grain Loading (gr/dscf)} \times 60 \text{ minutes/hour} \times \frac{1 \text{ lb}}{7000 \text{ grains}} \times 8760 \text{ hours/year} \times \frac{1 \text{ ton}}{2000 \text{ lbs}}
\]

#### Before Control

Before Control

\[
PTE \text{ of PM/PM10 (tons/year)} = \text{Air Flow Rate (acfm)} \times \text{Outlet Grain Loading (gr/dscf)} \times 60 \text{ minutes/hour} \times \frac{1 \text{ lb}}{7000 \text{ grains}} \times 8760 \text{ hours/year} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \times \frac{1}{1-\text{Control Efficiency %}}
\]

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Unit ID</th>
<th>Rate Baghouse (acfm)</th>
<th>Outlet Grain Loading (gr/dscf)</th>
<th>Before Control PM/PM10/PM2.5 (lbs/hour)</th>
<th>After Control PM/PM10/PM2.5 (tons/year)</th>
<th>Control Efficiency (%)</th>
<th>Dust collected lb/day</th>
<th>Dust collected lb/hr</th>
<th>Dust collected tpy</th>
<th>Dust collected lb/ft³</th>
<th>Dust collected lb/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>saw</td>
<td>3</td>
<td>2,500</td>
<td>0.05</td>
<td>1.14</td>
<td>4.98</td>
<td>0.99</td>
<td>27.00</td>
<td>1.13</td>
<td>4.93</td>
<td>7.58E-06</td>
<td>1.14</td>
</tr>
<tr>
<td>Table saw</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Planner</td>
<td>1</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PM/PM10 Emissions from Saw and Grinding from daily measurements
### Appendix A: Emissions Calculations
#### Natural Gas Combustion Units

**Company Name:** Wabash National Corporation (South)  
**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909  
**TV SPM No.:** 157-43401-00068  
**TV SSM No.:** 157-43422-00068  
**Reviewer:** Michaela Hecox  
**Date:** 11/12/2020

#### South Plant Building 8

<table>
<thead>
<tr>
<th>Location</th>
<th>Quantity</th>
<th>Manufacturer</th>
<th>Max MMBTU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Side prep</td>
<td>1</td>
<td>Sterling Alton</td>
<td>3.13</td>
</tr>
<tr>
<td>Line Maintenance</td>
<td>1</td>
<td>Applied Air</td>
<td>1.25</td>
</tr>
<tr>
<td>Metal Fab</td>
<td>1</td>
<td>Applied Air</td>
<td>0.40</td>
</tr>
<tr>
<td>Outside PX</td>
<td>1</td>
<td>Applied Air</td>
<td>3.13</td>
</tr>
<tr>
<td>Roof Foam</td>
<td>2</td>
<td>Applied Air</td>
<td>0.50</td>
</tr>
<tr>
<td>Side Foam</td>
<td>2</td>
<td>Applied Air</td>
<td>0.40</td>
</tr>
<tr>
<td>Roof Pit</td>
<td>1</td>
<td>Sterling Alton</td>
<td>1.25</td>
</tr>
<tr>
<td>Customer Supply</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
</tr>
<tr>
<td>Rail Bogie</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
</tr>
<tr>
<td>West Dock</td>
<td>2</td>
<td>Ceiling Unit</td>
<td>0.25</td>
</tr>
<tr>
<td>Sidetable</td>
<td>8</td>
<td>Ceiling Unit</td>
<td>0.25</td>
</tr>
<tr>
<td>5S / Wood Shop</td>
<td>4</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
</tr>
<tr>
<td>East Dock</td>
<td>4</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
</tr>
<tr>
<td>Wash Bay</td>
<td>3</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
</tr>
<tr>
<td>Finish</td>
<td>3</td>
<td>Vantage II Tube Heaters</td>
<td>0.13</td>
</tr>
<tr>
<td>Roof Unit</td>
<td>4</td>
<td>Air make-up</td>
<td>6.01</td>
</tr>
<tr>
<td>Metal Fab Office Roof Unit</td>
<td>1</td>
<td>Lennex</td>
<td>0.27</td>
</tr>
<tr>
<td>Cafeteria Roof Unit</td>
<td>1</td>
<td>Trane</td>
<td>0.25</td>
</tr>
<tr>
<td>HR / Offices / Con. Room</td>
<td>5</td>
<td>Lennex</td>
<td>0.27</td>
</tr>
<tr>
<td>Front Office</td>
<td>1</td>
<td>Water Heater</td>
<td>0.20</td>
</tr>
</tbody>
</table>

#### E@ES Building 27

- **Manufacturing Heat**: 5 units of Thermo Rotation, 0.85 MMBTU
- **West Dock**: 1 unit of Lennox Ceiling Unit, 0.25 MMBTU

#### Offline Building 18

- **Shop Heat**: 1 unit of Applied Air, 3.13 MMBTU

**Total**: 56 units, 49.56 MMBTU
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

---

**Company Name:** Wabash National Corporation (South)  
**Address City IN Zip:** 3550 Veterans Memorial Parkway South, Lafayette, IN 47909

**TV SPM No.:** 157-43401-00068  
**TV SSM No.:** 157-43422-00068  
**Reviewer:** Michaela Hecox  
**Date:** 11/12/2020

---

### Potential Throughput

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</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></td>
<td></td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100.0</td>
<td>5.5</td>
<td>84.0</td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

- PM*: 0.40  
- PM10*: 1.62  
- direct PM2.5*: 1.62  
- SO2: 0.13  
- NOx: 21.28  
- VOC: 17.88

---

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.**

**Emission Factors for NOx:**  
- Uncontrolled = 100  
- Low NOx Burner = 50  
- Low NOx Burners/Flue gas recirculation = 32

---

### Gas Emission Factors

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dibromobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

- Benzene: 0.0004  
- Dibromobenzene: 0.0003  
- Formaldehyde: 0.0160  
- Hexane: 0.3831  
- Toluene: 0.0007

---

### Gas Emission Factors

**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>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tbody>
</table>

**Potential Emission in tons/yr**

- Lead: 0.0001  
- Cadmium: 0.0002  
- Chromium: 0.0003  
- Manganese: 0.0001  
- Nickel: 0.0004  
- Combined HAPs: 0.402

---

### Greenhouse Gas Emission Factors

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>CO2</th>
<th>CH4</th>
<th>N2O</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>120,000</td>
<td>2.3</td>
<td>2.2</td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

- CO2: 25,537  
- CH4: 0  
- N2O: 0

**Summed Potential Emissions in tons/yr**

- 25,538

**CO2e Total in tons/yr based on 11/29/2013 federal GWPs**

- 25,689

**CO2e Total in tons/yr based on 10/30/2009 federal GWPs**

- 25,693

---

### Methodology

All emission factors are based on normal firing.  

- MMBtu = 1,000,000 Btu  
- MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

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

The five highest organic and metal HAPs emission factors are provided above.  
The NOx Emission Factor for uncontrolled is 2.2.  
The NOx Emission Factor for low Nox burner is 0.64.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).
Appendix A: Emissions Calculations
Storage Tanks

Company Name: Wabash National Corporation (South)
Address City IN Zip: 3550 Veterans Memorial Parkway South, Lafayette, IN 47909
TV SPM No.: 157-43401-00068
TV SSM No.: 157-43422-00068
Reviewer: Michaela Hecox
Date: 11/12/2020

### Storage Tanks

<table>
<thead>
<tr>
<th>Tank</th>
<th>Type of Storage Tank</th>
<th>VOC Emissions (lbs/yr)</th>
<th>VOC Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-1-G</td>
<td>550 Gallon Gasoline</td>
<td>234.69</td>
<td>1.17E-01</td>
</tr>
<tr>
<td>T-2-D</td>
<td>550 Gallon Diesel</td>
<td>0.38</td>
<td>1.90E-04</td>
</tr>
<tr>
<td>T-3-RD</td>
<td>550 Gallon Diesel</td>
<td>0.38</td>
<td>1.90E-04</td>
</tr>
<tr>
<td>T-4-RD</td>
<td>1000 Gallon Diesel</td>
<td>0.63</td>
<td>3.15E-04</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>236.08</strong></td>
<td><strong>0.12</strong></td>
</tr>
</tbody>
</table>

**Notes:**

VOC emissions are based on Tanks409d submission from the source
In order for the degreasers to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents “the use of which, for all cleaners and solvents combined, do not exceed one hundred forty-five (145) gallons per twelve (12) months”.

Based on a review of the solvents most widely supplied for the industry by Crystal Clean and Safety-Kleen, the following PTE is based on the following conservative estimates:

The solvent has a maximum density of 6.7 lb/gal.

The solvent used in the degreaser contains 100% VOC and up to 0.2% HAP (tetrachloroethylene).


Number of Degreasers: 5, using a combined maximum of 145 gal/yr.

<table>
<thead>
<tr>
<th>Uncontrolled Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.7 lb/gal x 100 % VOC x 145 gal/yr + 2000 lb/ton = 0.49 tons VOC per year</td>
</tr>
<tr>
<td>0.49 tpy VOC x 0.2 % HAP = 0.001 tons HAP per year</td>
</tr>
</tbody>
</table>
### Appended Table: Emission Calculations - Reciprocating Internal Combustion Engines - Natural Gas

#### 4-Stroke Rich-Burn (4SRB) Engines

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Wabash National Corporation (South)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address City</td>
<td>Lafayette, IN 47909</td>
</tr>
<tr>
<td>TV SPM No.:</td>
<td>157-43401-00068</td>
</tr>
<tr>
<td>TV SSM No.:</td>
<td>157-43422-00068</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Michaela Hecox</td>
</tr>
<tr>
<td>Date:</td>
<td>11/12/2020</td>
</tr>
</tbody>
</table>

| Maximum Heat Input Capacity (MMBtu/hr) | 0.72 |
| Maximum Hours Operated per Year (hr/yr) | 500  |
| Potential Fuel Usage (MMBtu/yr) | 360  |
| Potential Fuel Usage (MMcf/yr) | 0.35 |

#### Potential Fuel Usage

- **Emission Factor (lb/MMBtu):**
  - PM*: 9.50E-03
  - PM10*: 1.94E-02
  - PM2.5*: 1.94E-02
  - SO2: 5.88E-04
  - NOx: 2.21E+00
  - VOC: 2.96E-02
  - CO: 3.72E+00

- **Potential Emissions (tons/yr):**
  - PM*: 0.00
  - PM10*: 0.00
  - PM2.5*: 0.00
  - SO2: 1.96E-04
  - NOx: 0.01
  - VOC: 0.67
  - CO: 0.87

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>2.79E-03</td>
<td>5.03E-04</td>
</tr>
<tr>
<td>Acrolein</td>
<td>2.63E-03</td>
<td>4.73E-04</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.56E-03</td>
<td>2.84E-04</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>6.03E-04</td>
<td>1.18E-04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>2.05E-02</td>
<td>3.69E-03</td>
</tr>
<tr>
<td>Methanol</td>
<td>3.06E-03</td>
<td>5.99E-04</td>
</tr>
<tr>
<td><strong>Total PAH</strong></td>
<td>1.41E-04</td>
<td>2.54E-04</td>
</tr>
<tr>
<td>Toluene</td>
<td>5.56E-04</td>
<td>1.05E-04</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.95E-04</td>
<td>3.51E-05</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0.01</td>
<td>0.61</td>
</tr>
</tbody>
</table>

**HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.**

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)**

#### Methodology

- **Emission Factors** are from AP-42 (Supplement F, July 2000), Table 3.2-3.
- **Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]**
- **Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]**
January 14, 2021

David Mead  
Wabash National Corporation (South)  
PO Box 6129  
Lafayette, IN 47903-6129

Re: Public Notice  
Wabash National Corporation (South)  
Permit Level: Title V Sig Source Mod Minor PSD  
Title V Sig Permit Mod  
Permit Number: 157-43422-00068 & 157-43401-00068

Dear Mr. Mead:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: http://www.in.gov/apps/idem/caats/. Choose Search Option by Permit Number, then enter permit 43422 or 43401

and

IDEM’s Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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 Tippecanoe County Public Library, 627 South Street in Lafayette, IN. 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 draft permit 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 Michaela Hecox, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 14, 2021

To: Tippecanoe County Public 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: Wabash National Corporation (South)
Permit Number: 157-43422-00068 & 157-43401-00068

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

January 14, 2021
Wabash National Corporation (South)
157-43422-00068 & 157-43401-00058

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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.
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 14, 2021

A 30-day public comment period has been initiated for:

Permit Number: 157-43422-00068 & 157-43401-00068
Applicant Name: Wabash National Corporation (South)
Location: Lafayette, Tippecanoe County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
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<th>Insured Value</th>
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<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
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<tr>
<td>1</td>
<td></td>
<td>David Mead  Wabash National Corporation South PO Box 6129 Lafayette IN 479036129 (Source CAATS)</td>
<td></td>
<td></td>
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<td>2</td>
<td></td>
<td>Joe Hancock  Plant Manager Wabash National Corporation South PO Box 6129 Lafayette IN 47903 (RO CAATS)</td>
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<td></td>
<td>Tippecanoe County Commissioners 20 N 3rd St, County Office Building Lafayette IN 47901 (Local Official)</td>
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<td>Lafayette City Council and Mayors Office 20 North 6th Street Lafayette IN 47901-1411 (Local Official)</td>
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<td>Tippecanoe County Public Library 627 South St Lafayette IN 47901-1470 (Library)</td>
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<tr>
<td>7</td>
<td></td>
<td>Mrs. Phyllis Owens  3600 Cypress Lane Lafayette IN 47905 (Affected Party)</td>
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<td>8</td>
<td></td>
<td>Mr. Jerry White  3837 Basalt ST Lafayette IN 47909 (Affected Party)</td>
<td></td>
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<tr>
<td>9</td>
<td></td>
<td>Ms. Rose Filey  5839 Lookout Drive West Lafayette IN 47906 (Affected Party)</td>
<td></td>
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<td>10</td>
<td></td>
<td>Mr. William Cramer  128 Seminole Drive West Lafayette IN 47906 (Affected Party)</td>
<td></td>
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<td>West Lafayette City Council and Mayors Office 609 W. Navajo West Lafayette IN 47906 (Local Official)</td>
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<td>Mr. Allen Hoffman  4740 Masons Ridge Rd. Lafayette IN 47909 (Affected Party)</td>
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