NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)

for Ground Effects, Inc. in Allen County

Significant Permit Revision No.: 003-43807-00399

The Indiana Department of Environmental Management (IDEM) has received an application from Ground Effects, Inc., located at 13204 Aboite Rd, Roanoke, IN 46783, for a significant revision of its MSOP issued on February 11, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Ground Effects, Inc. to make certain changes at its existing source. Ground Effects, Inc. has applied to construct two (2) new spray booths with associated air-replacement units as well as expand the paved road area.

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:

Roanoke Public Library
314 N. Main St, Suite 120
Roanoke, IN 46783

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: https://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/public-notices/) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.
Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 003-43807-00399 in all correspondence.

Comments should be sent to:

Alexandrea Neuzerling  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Alexandrea Neuzerling or (317) 232-6634  
Or dial directly: (317) 232-6634  
Fax: (317) 232-6749 attn: Alexandrea Neuzerling  
E-mail: ANeuzerl@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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

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 Alexandrea Neuzerling of my staff at the above address.

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality
Mr. Paul Wittbrodt  
Ground Effects, Inc.  
13204 Aboite Road  
Roanoke, IN 46783  

Re: 003-43807-00399  
Significant Revision to  
M003-42083-00399  

Dear Mr. Wittbrodt:

Ground Effects, Inc. was issued a Minor Source Operating Permit (MSOP) No. M003-42083-00399 on February 2020 for a stationary polyurethane spray-in bed liner plant of pre-assembled vehicles located at 13204 Aboite Road, Roanoke, Indiana 46783. On February 25, 2021, the Office of Air Quality (OAQ) received an application from the source requesting to construct two (2) new spray booths with associate air-replacement units as well as expanding the paved road area. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, the following emission units are approved for construction at the source:

(a) One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.

(b) One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.
(c) Two (2) natural gas-fired air replacement units, no control, exhausting outdoors, and consisting of the following:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Associated Spray Booth</th>
<th>Construction Year</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARU-7</td>
<td>EULine7</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
<tr>
<td>ARU-8</td>
<td>EULine8</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
</tbody>
</table>

The following construction conditions are applicable to the proposed project:

1. **General Construction Conditions**
   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.

3. **Effective Date of the Permit**
   Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the Significant Permit Revision into the permit. All other conditions of the permit shall remain unchanged and in effect.

Please find attached the entire MSOP as revised, including the following new attachment(s):

**Attachment A: Fugitive Dust Control Plan**

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: [https://www.in.gov/idem/](https://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: [https://www.in.gov/idem/airpermit/public-participation/](https://www.in.gov/idem/airpermit/public-participation/); and the Citizens' Guide to IDEM on the Internet at: [https://www.in.gov/idem/resources/citizens-guide-to-idem/](https://www.in.gov/idem/resources/citizens-guide-to-idem/).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Allen County
Allen County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Minor Source Operating Permit

OFFICE OF AIR QUALITY

Ground Effects, Inc.
13204 Aboite Road
Roanoke, Indiana 46783

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M003-42083-00399
Master Agency Interest ID: 107318

Issued by: Original Signed by: Iryn Calilung, Section Chief
Permits Branch, Office of Air Quality
Issuance Date: February 11, 2020
Expiration Date: February 22, 2025

Significant Permit Revision No.: 003-43807-00399
Issued by: Iryn Calilung, Section Chief
Permits Branch, Office of Air Quality
Issuance Date:
Expiration Date: February 22, 2025
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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary polyurethane spray-in bed liner plant of pre-assembled vehicles.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>13204 Aboite Road, Roanoke, Indiana 46783</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(519) 944-3800</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>7549 (Automotive Services, Except Repair and Carwashes)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Allen</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Minor Source Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2  Emission Units and Pollution Control Equipment Summary

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

(a) One (1) spray booth, identified as EULine1, constructed in 2014, approved in 2017, 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-1.

(b) One (1) spray booth, identified as EULine2, constructed in 2014, approved in 2017, 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-2.
(c) One (1) spray booth, identified as EULine3, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-3.

(d) One (1) spray booth, identified as EULine4, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-4.

(e) One (1) spray booth, identified as EULine5, approved in 2017 for construction, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-5.

(f) One (1) spray booth, identified as EULine6, constructed in 2019, approved in 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-6.

(g) One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.
(h) One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.

(i) Eight (8) natural gas-fired air replacement units, no control, exhausting outdoors, and consisting of the following:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Associated Spray Booth</th>
<th>Construction Year</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARU-1</td>
<td>EULine1</td>
<td>2014</td>
<td>2.3</td>
</tr>
<tr>
<td>ARU-2</td>
<td>EULine2</td>
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<td>ARU-7</td>
<td>EULine7</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
<tr>
<td>ARU-8</td>
<td>EULine8</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
</tbody>
</table>

(j) Paved roads and parking lots, approved in 2021 to increase driving distance.
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]
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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M003-42083-00399, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

B.7 Duty to Provide Information

(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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 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

(c) The notification 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.

### B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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 Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M003-42083-00399 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
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

The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry
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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

B.16 Transfer of Ownership or Operational Control

The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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:
The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) 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.18 Credible Evidence [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

Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity  [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

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

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

   (A) Asbestos removal or demolition start date;

   (B) Removal or demolition contractor; or

   (C) Waste disposal site.

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

(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 2-6.1-5(a)(2)]

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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days
prior to the actual test date.

(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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring  [326 IAC 2-1.1-11]
Compliance with applicable requirements shall be documented as required by this permit. The
Permittee shall be responsible for installing any necessary equipment and initiating any required
monitoring related to that equipment. All monitoring and record keeping requirements not already
legally required shall be implemented when operation begins.

C.11 Instrument Specifications  [326 IAC 2-1.1-11]

(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

C.12 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

1. initial inspection and evaluation;

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

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

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

1. monitoring results;

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

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

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.

Record Keeping and Reporting Requirements  [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of 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
(b) 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.

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) spray booth, identified as EULine1, constructed in 2014, approved in 2017, 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-1.

(b) One (1) spray booth, identified as EULine2, constructed in 2014, approved in 2017, 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-2.

(c) One (1) spray booth, identified as EULine3, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-3.

(d) One (1) spray booth, identified as EULine4, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-4.

(e) One (1) spray booth, identified as EULine5, approved in 2017 for construction, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-5.
Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-5.

(f) One (1) spray booth, identified as EULine6, constructed in 2019, approved in 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-6.

(g) One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.

(h) One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.

(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 2-6.1-5(a)(1)]

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2(d)]

(a) Particulate from the surface coating booths EULine1 through EULine8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that
overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1(c), the Registrant shall maintain a record of any actions taken if overspray is visibly detected.

(b) Section C - General Record Keeping Requirements contains the Registrant's obligation with regard to record keeping
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Ground Effects, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>13204 Aboite Road</td>
</tr>
<tr>
<td>City:</td>
<td>Roanoke, Indiana 46783</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(519) 944-3800</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M003-42083-00399</td>
</tr>
</tbody>
</table>

I hereby certify that Ground Effects, Inc. is:

- □ still in operation.
- □ no longer in operation.

I hereby certify that Ground Effects, Inc. is:

- □ in compliance with the requirements of MSOP M003-42083-00399.
- □ not in compliance with the requirements of MSOP M003-42083-00399.

Authorized Individual (typed):

<table>
<thead>
<tr>
<th>Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
</tbody>
</table>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<table>
<thead>
<tr>
<th>Noncompliance:</th>
</tr>
</thead>
<tbody>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>----------------</td>
</tr>
</tbody>
</table>
This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.


THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _______ OR, PERMIT CONDITION # _______ AND/OR PERMIT LIMIT OF _____________

THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y N

COMPANY:_________________________________________ PHONE NO. (______)_________________
LOCATION: (CITY AND COUNTY)____________________________________________________________________
PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:_________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:____________________________________
____________________________________________________________________________________________
DATE/TIME MALFUNCTION STARTED: ____/____/20___ ______________________________ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _________________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/______/20____ ___________________ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:____________________________________
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: ______________________________
MEASURES TAKEN TO MINIMIZE EMISSIONS:________________________________________________________
____________________________________________________________________________________________
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:______________________________
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____________________________
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:__________________
INTERIM CONTROL MEASURES: (IF APPLICABLE):___________________________________________________
____________________________________________________________________________________________
MALFUNCTION REPORTED BY:____________________________ TITLE:____________________________
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY:________________________ DATE:________________ TIME:______________

*SEE PAGE 2
326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

________________________________________________________________________
________________________________________________________________________
Purpose: This Dust Control Plan was prepared because of the potential to emit fugitive particulate matter from paved roadway surfaces at the Facility. The Ground Effects, LLC Plant Manager is responsible for the execution of this Dust Control Plan [326 IAC 6-5-5(a)(2) and (3)]

Figure 2 (attached) shows the paved roadway surfaces at the Facility. [326 IAC 6-5-5(a)(4)]

The vehicular activity occurring on paved roadway surfaces consists of up to 960 pickup truck style vehicles per day, with a gross weight of up to 8,500 lbs each. The vehicular activity consists of the trucks entering the facility property and being staged at a holding area; traveling from the holding areas to the plant interior where the bed liner coating is applied; traveling from the plant back the holding areas, and traveling from the holding areas to the facility exit. [326 IAC 6-5-5(a)(5)]

The Facility will use one or more of the following measures to control fugitive particulate matter emissions resulting for paved roadway surfaces [326 IAC -6-5-5(a)(6)]

- Cleaning by vacuum sweeping
- Flushing

Ground Effects, LLC will be responsible for determining when a dust control measure will be implemented. The primary method for determining when to implement a control measure will be based on observations of fugitive dust observed when the trucks are traveling on the paved roadway surfaces. The primary source of particulate matter on the paved roadway surfaces is from the local agricultural fields. Therefore, the potential accumulation of particulate matter on the paved roadway surfaces is seasonally dependent based on the level of agricultural activities that disturb the soil, along with weather conditions. Operations at the Facility generate very little particulate matter that would contribute to accumulation on the paved roadway surfaces. Therefore, implementing any dust control measures will occur on an as needed basis because it primarily dependent on the agricultural activities and weather conditions.

Ground Effects, LLC will maintain records that indicate when a control measure is implemented and what control measure is implemented. [326 IAC 6-5-5(b)]

Schedule of Compliance: This Dust Control Plan will become effective when operations associated with Coating Booths 7 and/or 8 commence operation. [326 IAC 6-5-6(c)]
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit (MSOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Ground Effects, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>13204 Aboite Road, Roanoke, Indiana 46783</td>
</tr>
<tr>
<td>County:</td>
<td>Allen</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>7549 (Automotive Services, Except Repair and Carwashes)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>M003-42083-00399</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>February 11, 2020</td>
</tr>
<tr>
<td>Significant Permit Revision No.:</td>
<td>003-43807-00399</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Alexandrea Neuzerling</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued MSOP No. M003-42083-00399 on February 11, 2020. The source has since received the following approval:

(a) Interim Significant Permit Revision No. 003-43807I-00399, issued on April 30, 2021.

County Attainment Status

The source is located in Allen 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>PM₂₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂₅ 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. Allen 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) PM₂₅
Allen County has been classified as attainment for PM₂₅. Therefore, direct PM₂₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants

Allen 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 (326 IAC 2-7) and MSOP (326 IAC 2-6.1) 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

This table reflects the unrestricted potential emissions of the source prior to the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (tons/year)</th>
<th>PM1</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>Total PTE of Entire Source Excluding Fugitives*</td>
<td>59.34</td>
<td>59.68</td>
<td>59.69</td>
<td>0.04</td>
<td>5.93</td>
<td>23.45</td>
<td>4.98</td>
<td>2.11</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Source-Wide Fugitives*</td>
<td>70.62</td>
<td>61.94</td>
<td>60.24</td>
<td>0.04</td>
<td>5.93</td>
<td>23.45</td>
<td>4.98</td>
<td>2.11</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt;100</td>
<td>&lt;25</td>
</tr>
</tbody>
</table>

1 Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."

2 PM2.5 listed is direct PM2.5.

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

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

(c) These emissions are based on the TSD of MSOP No. M003-42083-00399, issued on February 11, 2020.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ground Effects, Inc. on February 25, 2021, relating to the following:

(1) Adding two (2) more coating lines and associated natural gas-fired air replacement units:

(a) One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.

(b) One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.

(c) Two (2) natural gas-fired air replacement units, no control, exhausting outdoors, and consisting of the following:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Associated Spray Booth</th>
<th>Construction Year</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARU-7</td>
<td>EULine7</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
<tr>
<td>ARU-8</td>
<td>EULine8</td>
<td>Approved in 2021 for construction</td>
<td>2.3</td>
</tr>
</tbody>
</table>

(2) Increasing the potential paved road driving distance.

(3) Revising the coating usage for all booths. This resulted in an overall decrease in emissions for the existing coating booths. See the Proposed Changes section or Appendix A of this TSD for changes being made.
Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

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

Permit Level Determination – MSOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{X}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>EULine7</td>
<td>8.36</td>
<td>8.36</td>
<td>8.36</td>
<td>-</td>
<td>-</td>
<td>2.55</td>
<td>-</td>
<td>0.05</td>
<td>0.23</td>
</tr>
<tr>
<td>EULine8</td>
<td>8.36</td>
<td>8.36</td>
<td>8.36</td>
<td>-</td>
<td>-</td>
<td>2.55</td>
<td>-</td>
<td>0.05</td>
<td>0.23</td>
</tr>
<tr>
<td>Air Replacement Units</td>
<td>0.04</td>
<td>0.15</td>
<td>0.15</td>
<td>0.01</td>
<td>1.98</td>
<td>0.11</td>
<td>1.66</td>
<td>-</td>
<td>0.04</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units</strong></td>
<td><strong>16.76</strong></td>
<td><strong>16.87</strong></td>
<td><strong>16.87</strong></td>
<td><strong>0.01</strong></td>
<td><strong>1.98</strong></td>
<td><strong>5.21</strong></td>
<td><strong>1.66</strong></td>
<td><strong>0.10</strong></td>
<td><strong>0.50</strong></td>
</tr>
</tbody>
</table>

1PM_{2.5} listed is direct PM_{2.5}.
2Single highest HAP.

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

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{X}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTE Before Modification (Paved Roads)</td>
<td>11.28</td>
<td>2.26</td>
<td>0.55</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE After Modification (Paved Roads)</td>
<td>48.76</td>
<td>9.75</td>
<td>2.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>PTE Increase (Paved Roads)</strong></td>
<td><strong>37.48</strong></td>
<td><strong>7.50</strong></td>
<td><strong>1.84</strong></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE Before Modification (EULine1 through EULine6)</td>
<td>59.22</td>
<td>59.22</td>
<td>59.22</td>
<td>-</td>
<td>-</td>
<td>23.1</td>
<td>-</td>
<td>0.66</td>
<td>1.98</td>
</tr>
<tr>
<td>PTE After Modification (EULine1 through EULine6)</td>
<td>50.16</td>
<td>50.16</td>
<td>50.16</td>
<td>-</td>
<td>-</td>
<td>15.30</td>
<td>-</td>
<td>0.30</td>
<td>1.38</td>
</tr>
<tr>
<td><strong>PTE Increase (EULine1 through EULine6)</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td>-</td>
<td>-</td>
<td>0.00</td>
<td>-</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the Modified Emission Unit(s)/Process(es)</strong></td>
<td><strong>37.48</strong></td>
<td><strong>7.50</strong></td>
<td><strong>1.84</strong></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

1PM_{2.5} listed is direct PM_{2.5}.
2Single highest HAP.
Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

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

<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE Before Controls of the New Emission Units</td>
<td>16.76</td>
<td>16.87</td>
<td>16.87</td>
<td>0.01</td>
<td>1.98</td>
<td>5.21</td>
<td>1.66</td>
<td>0.10</td>
<td>0.50</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Unit(s)/Process</td>
<td>37.48</td>
<td>7.50</td>
<td>1.84</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of the Revision</td>
<td>54.24</td>
<td>24.37</td>
<td>18.71</td>
<td>0.01</td>
<td>1.98</td>
<td>5.21</td>
<td>1.66</td>
<td>0.10</td>
<td>0.50</td>
</tr>
</tbody>
</table>

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

$^2$Single highest HAP.

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

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units with a potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants: PM.

### PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. 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>
<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>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>67.04</td>
<td>67.49</td>
<td>67.49</td>
<td>0.05</td>
<td>7.90</td>
<td>20.85</td>
<td>6.64</td>
<td>2.00</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Source-Wide Fugitives*</td>
<td>115.80</td>
<td>77.24</td>
<td>69.88</td>
<td>0.05</td>
<td>7.90</td>
<td>20.85</td>
<td>6.64</td>
<td>2.00</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 25</td>
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<tr>
<td>PSD Major Source Thresholds</td>
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<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</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$_{2.5}$.

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

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).
(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

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

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

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for ARU-7 and ARU-8, because the natural gas fired air replacement units are not steam generating units.

(b) The requirements of the New Source Performance Standard for Automobile and Light-Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for EULine7 and EULine8, because this source does not operate an automobile or light-duty truck assembly plant.

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

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

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85 are not included in the permit for the spray booths EULine7 and EULine8, since this source is an area source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for the spray booths EULine7 and EULine8, since this source is an area source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for the air replacement units ARU-7 and ARU-8 since this source is an area source of HAPs and the heaters are not process heaters.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, since Ground Effects, Inc. previously submitted documentation from the U.S. EPA, dated October 30, 2017, stating that Ground Effects, Inc. is exempt from the requirements of 40 CFR 63, Subpart HHHHHH. See MSOP No. M003-42083-00399, issued on February 11, 2020 for more information regarding this exemption.

(e) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

**Compliance Assurance Monitoring (CAM):**

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

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

**326 IAC 2-6.1 (MSOP)**
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

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

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

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**
This source was constructed after December 13, 1985 and has potential fugitive particulate emissions of twenty-five (25) tons per year or more. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan that is included as Attachment A to the permit.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Allen 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 Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

**326 IAC 6.8 (Lake County: Fugitive Particulate Matter)**
Pursuant to 326 IAC 6.8-10-1, this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.
State Rule Applicability – Individual Facilities

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

The update in coating usage for Spray Booths EULine1 through EULine6 does not change any existing state rule applicability, so they are not included in this evaluation.

Spray Booths (EULine7 and EULine8)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to spray booths EULine7 and EULine8, since they are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and 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).

(a) Pursuant to 326 IAC 6-3-1(d), particulate from the surface coating booths EULine7 and EULine8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-1(d)(2), if overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though EULine7 and EULine8 will be constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)
EULine7 and EULine8 coat light duty trucks rated at 8,500 pounds gross weight or less which are designed primarily for the purpose of transportation, the vehicles are already assembled prior to painting. Therefore, these booths are not considered automated or light duty truck assembly plants and the requirements of 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations) do not apply.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a), EULine7 and EULine8 are not subject to the requirements of 326 IAC 8-2-9 because this source does not coat any products that fall under the categories listed in 326 IAC 8-2-9(a)(1).

326 IAC 8-10 (Automobile Refinishing)
EULine7 and EULine8 apply a protective surface coating to truck beds. Ground Effects, Inc. operates an original equipment manufacturing coating line. These are not refinishing lines as defined in 326 IAC 8-10-2(35). Therefore, the requirements of 326 IAC 8-10 (Automobile Refinishing) do not apply.

Natural Gas Combustion (ARU-7 and ARU-8)
326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired air replacement units ARU-7 and ARU-8 are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because, pursuant to 326 IAC 1-2-19, these units do not meet the definition of indirect heating unit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired air replacement units ARU-7 and ARU-8 are not subject to the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
These emission units, ARU-7 and ARU-8 are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, ARU-7 and ARU-8 will be constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to ARU-7 and ARU-8, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to ARU-7 and ARU-8, since these units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements
There are no new or modified compliance requirements included with this revision.

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

(1) The Emission Unit Descriptions in Section A.2 were revised to update coating usage for existing emission units as well as add the new emission units to the permit:

A.2 Emission Units and Pollution Control Equipment Summary
This stationary source consists of the following emission units and pollution control devices:

(a) One (1) spray booth, identified as EULine1, constructed in 2014, approved in 2017, and 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791 303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-1.
(b) One (1) spray booth, identified as EULine2, constructed in 2014, approved in 2017, and 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-2.

(c) One (1) spray booth, identified as EULine3, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-3.

(d) One (1) spray booth, identified as EULine4, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-4.

(e) One (1) spray booth, identified as EULine5, approved in 2017 for construction, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-5.

(f) One (1) spray booth, identified as EULine6, constructed in 2019, approved in 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit
by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-6.

(g) One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.

(h) One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.

(gi) Six (6) Eight (8) natural gas-fired air replacement units, no control, exhausting outdoors, and consisting of the following:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Associated Spray Booth</th>
<th>Construction Year</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARU-1</td>
<td>EULine1</td>
<td>2014</td>
<td>2.3</td>
</tr>
<tr>
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<td>EULine2</td>
<td>2014</td>
<td>2.3</td>
</tr>
<tr>
<td>ARU-3</td>
<td>EULine3</td>
<td>2016</td>
<td>2.3</td>
</tr>
<tr>
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<td>2.3</td>
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</tr>
<tr>
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<td>Approved in 2021</td>
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<tr>
<td>ARU-8</td>
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<td></td>
<td></td>
<td>for construction</td>
<td></td>
</tr>
</tbody>
</table>

(hj) Paved roads and parking lots, approved in 2021 to increase driving distance.

(2) The Emission Unit Description box in Section D.1 was revised to update coating usage for existing emission units as well as add the new spray booths to the section:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) One (1) spray booth, identified as EULine1, constructed in 2014, approved in 2017, and 2019, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit.</td>
</tr>
</tbody>
</table>
The booth uses dry filters as control and exhausts to stack SV-1.

(b) One (1) spray booth, identified as EUline2, constructed in 2014, approved in 2017, and 2021 for modification to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The booth uses dry filters as control and exhausts to stack SV-2.

(c) One (1) spray booth, identified as EUline3, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-3.

(d) One (1) spray booth, identified as EUline4, constructed in 2016, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-4.

(e) One (1) spray booth, identified as EUline5, approved in 2017 for construction, approved in 2019 and 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-5.

(f) One (1) spray booth, identified as EUline6, constructed in 2019, approved in 2021 to change coatings usage, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and seven hundred ninety-one three hundred and three thousandths (2.791303) gallons of coating per vehicle, six four-thousandths (0.004 0.006) of a gallon of bonding agent per vehicle, and fourteen twenty-five thousandths (0.025 0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-6.
One (1) spray booth, identified as EULine7, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-7.

One (1) spray booth, identified as EULine8, approved in 2021 for construction, using a two-component spray gun to apply a two-component polyurethane coating to light-duty truck beds. The booth can coat 43,800 vehicles per year with each vehicle weighing 8,500 pounds gross weight or less. The booth uses two and three hundred and three thousandths (2.303) gallons of coating per vehicle, six-thousandths (0.006) of a gallon of bonding agent per vehicle, and fourteen thousandths (0.014) gallons of solvents per vehicle. Three thousandths (0.003) gallons of solvent are used to clean the spray equipment per vehicle. The spray booth is heated to ninety-five (95) degrees Fahrenheit by a dedicated air replacement unit. The booth uses dry filters as control and exhausts to stack SV-8.

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

(3) Condition D.1.1(a) was revised to include the new spray booths, EULine7 and EULine8:

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2(d)]

(a) Particulate from the surface coating booths EULine1 through EULine6 EULine8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

Additional Changes

IDEM, OAQ made additional revisions 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.

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 February 25, 2021.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 003-43807-00399. The staff recommends to the Commissioner that the MSOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

(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: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.
## Appendix A: Emissions Calculations

### Summary

Company Name: Ground Effects, Inc.  
Source Address: 13204 Aboite Road, Roanoke, Indiana 46783  
MSOP Number: M003-42083-00399  
Significant Permit Revision No.: 003-43807-00399  
Reviewer: Alexandrea Neuzerling

<table>
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<tr>
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<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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### Uncontrolled Potential to Emit (tons/year)

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<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<th>Single HAP</th>
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<td>Air Replacement Units</td>
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- Methanol and Methyl Isobutyl Ketone
- Hexane

- Methanol and Methyl Isobutyl Ketone
Appendix A: Emissions Calculations
SPR 43807

Company Name: Ground Effects, Inc.
Source Address: 13204 Aboite Road, Roanoke, Indiana 46783
MSOP Number: M003-42083-00399
Significant Permit Revision No.: 003-43807-00399
Reviewer: Alexandrea Neuzerling

### Uncontrolled Potential to Emit (tons/year) Before Revision

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<th>Emission Units</th>
<th>PM10</th>
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<th>NOX</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Single HAP</th>
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<td>9.87</td>
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<td>9.87</td>
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<th>VOC</th>
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Note: For MSOP level permits, Fugitive Emissions are not included in Source Level Determination, but Fugitive Emissions are included in the Revision PTE.
# Appendix A: Emissions Calculations

## Coatings - Particulate Emissions

### Company Name:
Ground Effects, Inc.

### Source Address:
13204 Aboite Road, Roanoke, Indiana 46783

### MSOP Number:
M003-42083-00399

### Significant Permit Revision No.:
003-43807-00399

### Reviewer:
Alexandrea Neuzerling

### Coating/Product Name Total Usage (gal/yr) Density (lbs/gal) Solid Weight % Transfer Efficiency (%) PM Emissions Before Control (tons/yr) Control Efficiency (%) PM Emissions After Control (tons/yr)

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<tr>
<th>Coating/Product Name</th>
<th>Total Usage (gal/yr)</th>
<th>Density (lbs/gal)</th>
<th>Solid Weight %</th>
<th>Transfer Efficiency (%)</th>
<th>PM Emissions Before Control (tons/yr)</th>
<th>Control Efficiency (%)</th>
<th>PM Emissions After Control (tons/yr)</th>
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<td>806,925</td>
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<td>75</td>
<td>1.73</td>
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<td>75</td>
<td>1.73</td>
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<td>0.01</td>
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<td>75</td>
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<td>66.89</td>
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### Notes:

1. Typical transfer efficiency used by the Facility in all its operations in USA and accepted by regulatory agencies.

2. The Facility uses a combined filter system. Two filters used are E28 filter over C50 filter. Here are the control efficiencies:

   - E28 is 99.45%
   - C50 is 98.94%

   Since, the first filter will control most of the emissions, conservatively 99.45% control efficiency was used from the first filter and the control efficiency from the second filter was ignored.

3. PM Emissions are calculated as a total for all eight (8) spray booths. All booths use the same coatings, one at a time. The cleaning products are wiped on by hand. See the 'Coatings - Usage' for the usage calculations.

4. Coating A and Coating B are combined before being applied to vehicles.

### Methodology

PM Emissions Before Control (tons/yr) = Total Usage (gal/yr) * Density (lbs/gal) * Solid Weight % / 100 * (1 - (Transfer Efficiency (%) / 100)) / 2000 lbs/ton

PM Emissions After Control (tons/yr) = PM Emissions Before Control (tons/yr) * (1 - Control Efficiency (%))
## Appendix A: Emissions Calculations
### Coatings - VOC Emissions

**Company Name:** Ground Effects, Inc.
**Source Address:** 13204 Aboite Road, Roanoke, Indiana 46783
**MSOP Number:** M003-42083-00399
**Significant Permit Revision No.:** 003-43807-00399
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Coating/Product Name</th>
<th>Total Usage (gal/yr)</th>
<th>VOC Content (lbs/gal)</th>
<th>VOC Emissions (tons/yr)</th>
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<td>Inbound Cleaning Solvent/WS-4152 PREP WASH</td>
<td>2,515</td>
<td>4.59</td>
<td>5.77</td>
</tr>
<tr>
<td>Outbound Cleaning Solvent/Denatured Ethyl Alcohol 4240</td>
<td>2,401</td>
<td>6.76</td>
<td>8.12</td>
</tr>
<tr>
<td>Gun Cleaner/All Solvent- Polyurethane Remover</td>
<td>1,116</td>
<td>8.89</td>
<td>4.96</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>20.41</strong></td>
</tr>
</tbody>
</table>

1. VOC Emissions are calculated as a total for all eight (8) spray booths. See 'Coatings - Usage' tab for usage calculations.
2. Coating A and Coating B are combined before being applied to vehicles.

**Methodology**

VOC Emissions (tons/yr) = Total Usage (gal/yr) * VOC Content (lbs/gal) / 2000 lbs/ton
## Appendix A: Emissions Calculations

### Coatings - HAPs Emissions

#### Company Name:
Ground Effects, Inc.

#### Source Address:
13204 Aboite Road, Roanoke, Indiana 46783

#### MSOP Number:
M003-42083-00399

#### Significant Permit Revision No.:
003-43807-00399

#### Reviewer:
Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Coating/Product Name</th>
<th>Density (lbs/gal)</th>
<th>Coating Usage (gal/yr)</th>
<th>Coating Usage (lbs/yr)</th>
<th>HAP Ingredient</th>
<th>Ingredient CAS#</th>
<th>Ingredient Weight %</th>
<th>Ingredient Emissions (lbs/yr)</th>
<th>HAP Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating A/UL MPL 55 A-Side4</td>
<td>9.61</td>
<td>806,925</td>
<td>7,754,545</td>
<td>MDI 1</td>
<td>101-68-8</td>
<td>57</td>
<td>0.0958</td>
<td>0.000048</td>
</tr>
<tr>
<td>Bonding Agent/Ultimate Linings Bonding Agent</td>
<td>9.10</td>
<td>1,997</td>
<td>18,174</td>
<td>MDI 2</td>
<td>101-68-8</td>
<td>13</td>
<td>0.041</td>
<td>0.041</td>
</tr>
<tr>
<td>Outbound Cleaning Solvent/Denatured Ethyl Alcohol 4240</td>
<td>6.76</td>
<td>2,401</td>
<td>18,240</td>
<td>Methanol</td>
<td>67-56-1</td>
<td>5</td>
<td>812</td>
<td>0.41</td>
</tr>
<tr>
<td>Gun Cleaner/All Solvent- Polyurethane Remover</td>
<td>8.89</td>
<td>1,116</td>
<td>9,926</td>
<td>4-methylpentan-2-one (Methyl Isobutyl Ketone)</td>
<td>108-10-1</td>
<td>5</td>
<td>812</td>
<td>0.41</td>
</tr>
<tr>
<td><strong>Total HAP Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>0.41</strong></td>
<td><strong>1.85</strong></td>
</tr>
</tbody>
</table>

**HAP Emissions Per Line**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emissions (ton/yr/line)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MDI</td>
<td>0.0052</td>
</tr>
<tr>
<td>Methanol</td>
<td>0.0058</td>
</tr>
<tr>
<td>4-methylpentan-2-one (Methyl Isobutyl Ketone)</td>
<td>0.0058</td>
</tr>
<tr>
<td>2-Phenoxy Ethanol</td>
<td>0.1241</td>
</tr>
</tbody>
</table>

**Notes:**

1. See HAP - MDI Calcs
2. Based on conservatively assuming 3.5% evaporation of bonding agent and weight % of ingredients. Manufacturer supplied information indicated only 2% evaporation of bonding agent.
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**MM BTU/HR <100**

**Company Name:** Ground Effects, Inc.  
**Source Address:** 13204 Aboite Road, Roanoke, Indiana 46783  
**MSOP Number:** M003-42083-00399  
**Significant Permit Revision No.:** 003-43807-00399  
**Reviewer:** Alexandrea Neuzerling

### Natural Gas Combustion Only

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>mmscf</td>
</tr>
<tr>
<td>18.4</td>
<td>1020</td>
<td>158.0</td>
</tr>
</tbody>
</table>

### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.15</td>
<td>0.60</td>
<td>0.60</td>
<td>0.05</td>
<td>7.90</td>
<td>0.43</td>
<td>6.64</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only.**  
**PM10 emission factor is filterable and condensable PM10 combined.**  
**PM2.5 emission factor is filterable and condensable PM2.5 combined.**  

**Emission Factors for NOx:**  
Uncontrolled = 100,  
Low NOx Burner = 50,  
Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th></th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.6E-02</td>
<td>1.8E+00</td>
<td>3.4E+03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.7E-04</td>
<td>9.5E-05</td>
<td>5.9E-03</td>
<td>0.14</td>
<td>2.7E-04</td>
<td>0.15</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th></th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>4.0E-05</td>
<td>8.7E-05</td>
<td>1.1E-04</td>
<td>3.0E-05</td>
<td>1.7E-04</td>
<td>4.3E-04</td>
</tr>
</tbody>
</table>

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Ground Effects, Inc.
Source Address: 13204 Aboite Road, Roanoke, Indiana 46783
MSOP Number: M003-42083-00399
Significant Permit Revision No.: 003-43807-00399
Reviewer: Alexandria Neuzerling

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>960.0</td>
<td>1.0</td>
<td>960.0</td>
<td>4.3</td>
<td>4080.0</td>
<td>4224</td>
<td>0.800</td>
<td>768.0</td>
</tr>
</tbody>
</table>

Vehicles Processed (Round Trip) = 960.0

Average Vehicle Weight Per Trip = 4.3 tons/trip
Average Miles Per Trip = 0.80 miles/trip

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

where $k = \begin{bmatrix} \text{PM} \\ \text{PM10} \\ \text{PM2.5} \end{bmatrix} = \begin{bmatrix} 0.011 \\ 0.0022 \\ 0.00054 \end{bmatrix}$ lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
$W = \begin{bmatrix} 4.3 \\ 4.3 \\ 4.3 \end{bmatrix}$ tons = average vehicle weight
$sL = \begin{bmatrix} 9.7 \\ 9.7 \\ 9.7 \end{bmatrix}$ g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = Ef \cdot \left[ 1 - \left( \frac{p}{4N} \right) \right]$ (Equation 2 from AP-42 13.2.1)

where $p = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
$N = 365$ days per year

Mitigated Emission Factor, $E_{ext} = \begin{bmatrix} \text{PM} \\ \text{PM10} \\ \text{PM2.5} \end{bmatrix} = \begin{bmatrix} 0.380 \\ 0.076 \\ 0.0187 \end{bmatrix}$ lb/mile

Mitigated PTE of PM (Before Control) (tons/yr) = 48.76
Mitigated PTE of PM10 (Before Control) (tons/yr) = 9.75
Mitigated PTE of PM2.5 (Before Control) (tons/yr) = 2.39

Process

<table>
<thead>
<tr>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>48.76</td>
<td>9.75</td>
<td>2.39</td>
</tr>
</tbody>
</table>

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] \times [Maximum trips per day (trip/day)]
Total one-way distance (miles/day) = [Maximum one-way distance (feet/trip)] / (5280 ft/mile)
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per day (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \times [Unmitigated Emission Factor (lb/mile)] \times (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \times [Mitigated Emission Factor (lb/mile)] \times (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
## Coatings - Raw Material Info

**Company Name:** Ground Effects, Inc.  
**Source Address:** 13204 Aboite Road, Roanoke, Indiana 46783  
**MSOP Number:** M003-42083-00399  
**Significant Permit Revision No.:** 003-43807-00399  
**Reviewer:** Alexandrea Neuzerling

### Table: Emissions Calculations

<table>
<thead>
<tr>
<th>Coating</th>
<th>Product Name</th>
<th>Density (lbs/gal)</th>
<th>Coating A Ingredient</th>
<th>Ingredient CAS#</th>
<th>HAP (Y/N)</th>
<th>Ingredient Weight %</th>
<th>VOC Content (lbs/gal)¹</th>
<th>HAP (lbs/gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coating A</td>
<td>UL MPL 55 A-Side</td>
<td>0.61</td>
<td>MDI</td>
<td>101-68-8</td>
<td>Y</td>
<td>57</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Polyurethane Prepolymer</td>
<td>68992-58-0</td>
<td>N</td>
<td>59</td>
<td>10.83</td>
<td>10.83</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4-Methyl-1,3-Dioxolan-2-one</td>
<td>108-32-7</td>
<td>N</td>
<td>10</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Coating B</td>
<td>UL-MPL 55 Coat B</td>
<td>0.73</td>
<td>Polyurethane Prepolymer</td>
<td>68992-58-0</td>
<td>Y</td>
<td>59</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Aromatic Amine</td>
<td>68479-98-1</td>
<td>Y</td>
<td>10</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bonding Agent</td>
<td>Ultimate Linings Bonding Agent</td>
<td>0.10</td>
<td>Dimethyl Glutarate</td>
<td>1119-40-0</td>
<td>N</td>
<td>10</td>
<td>1.56</td>
<td>0.02</td>
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<tr>
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<td>Dimethyl Succinate</td>
<td>106-65-0</td>
<td>N</td>
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<td>0.4</td>
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<td>Dimethyl Adipate</td>
<td>627-93-0</td>
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<td>18</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Carbonic Acid, Cyclic Propylene Ester</td>
<td>108-32-7</td>
<td>N</td>
<td>7</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>M-Pyridine</td>
<td>872-50-4</td>
<td>N</td>
<td>13</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Modified MDI</td>
<td>101-68-8</td>
<td>Y</td>
<td>13</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Isocyanic Acid</td>
<td>70644-98-3</td>
<td>N</td>
<td>13</td>
<td>0.00</td>
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</tr>
<tr>
<td>Inbound Cleaning Solvent</td>
<td>WS-4152 PREP WASH</td>
<td>0.10</td>
<td>Isopropyl Alcohol</td>
<td>67-63-0</td>
<td>N</td>
<td>64.7</td>
<td>4.59</td>
<td>0.00</td>
</tr>
<tr>
<td>Outbound Cleaning Solvent</td>
<td>Denatured Ethyl Alcohol (4240)</td>
<td>0.76</td>
<td>Ethanol</td>
<td>64-17-5</td>
<td>N</td>
<td>100</td>
<td>0.00</td>
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<tr>
<td></td>
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<td></td>
<td>Methanol</td>
<td>67-56-1</td>
<td>Y</td>
<td>5</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4-methylpentan-2-one (Methyl Isobutyl Ketone)</td>
<td>108-10-1</td>
<td>Y</td>
<td>5</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ethyl Acetate</td>
<td>141-78-6</td>
<td>N</td>
<td>1.5</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Gun Cleaner</td>
<td>All Solve - Polyurethane remover</td>
<td>0.89</td>
<td>1-Methyl, 2-Pyrrolidone</td>
<td>872-50-4</td>
<td>N</td>
<td>60</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Naphthalene, 2-Hydroxy-1-Naphthalene</td>
<td>96-48-0</td>
<td>N</td>
<td>30</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2-Phenoxy Ethanol</td>
<td>122-99-6</td>
<td>Y</td>
<td>20</td>
<td>8.89</td>
<td>1.78</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Propanol</td>
<td>25498-89-1</td>
<td>N</td>
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<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Branched- Methylphenol</td>
<td>68412-58-4</td>
<td>N</td>
<td>10</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ethyl-3-propionate</td>
<td>763-69-9</td>
<td>N</td>
<td>10</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Notes:**  
¹ VOC Content for Coating A, Coating B, and Bonding Agent From SDS Provided by Source
## Appendix A: Emissions Calculations
### Coatings - Usage Rates

**Company Name:** Ground Effects, Inc.  
**Source Address:** 13204 Aboite Road, Roanoke, Indiana 46783  
**MSOP Number:** M003-42083-00399  
**Significant Permit Revision No.:** 003-43807-00399  
**Reviewer:** Alexandrea Neuzeuling

<table>
<thead>
<tr>
<th>Coating</th>
<th>Product Name</th>
<th>Vehicle Coating Rate</th>
<th>Facility wide projected throughput 1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Vehicles/Shift/Booth</td>
<td># of Shifts/day</td>
<td># of Booths</td>
</tr>
<tr>
<td>Coating A²</td>
<td>UL MPL 55 A-Side</td>
<td>40</td>
<td>3</td>
</tr>
<tr>
<td>Coating B²</td>
<td>UL-MPL 55 Coat B</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bonding Agent</td>
<td>Ultimate Linings Bonding Agent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inboung Cleaning Solvent</td>
<td>WS-4152 PREP WASH</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Solvent (DEA 4240)</td>
<td>Denatured Ethyl Alcohol (4240)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Solvent (All solve )</td>
<td>All Solve - Polyurethane Remover</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 Usage rates are based on historical usage rates with a safety factor added.  
2 Coating A and Coating B are combined before being applied to vehicles.
Appendix A: Emissions Calculations
HAP - MDI Calcs

Company Name: Ground Effects, Inc.
Source Address: 13204 Aboite Road, Roanoke, Indiana 46783
MSOP Number: M003-42083-00399
Significant Permit Revision No.: 003-43807-00399
Reviewer: Alexandrea Neuzerling

Volume of Displaced Air ($V_{air}$) | Process Temperature ($T_{proc}$) | Vapor Pressure $VP_{MDI}$ | Molecular Weight ($M_w$) | Adjustment Factor $K_{MDI}$ | Emissions (Lfd) \(^1\)
---|---|---|---|---|---
3,446,465 | 308.15 | 3.42E-05 | 250.26 | 1 | 0.0958

$Lfd = V_{air} \times \frac{1}{359} \times \frac{273.15}{T_{proc}} \times \frac{VP_{MDI}}{760} \times M_w \times K_{MDI}$

where,

$Lfd$ = emissions lb./year.
$V_{air}$ = annual volume of displaced air in ft\(^3\)/year.
$VP_{MDI}$ = vapor pressure of MDI in mm Hg at process temperature.
$T_{proc}$ = process temperature in °K. (maximum temperature of the MDI)
$M_w$ = 250.26 (this is the molecular weight of MDI).
$K_{MDI}$ = adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature.
359 = the molar volume of an ideal gas in ft\(^3\)/lb-mole @ 0°C and 1-atmosphere.

Calculation of Annual Volume of Displaced Air ($V_{air}$) - Based on Annual Consumption

Projected Annual Usage of Coating A

<table>
<thead>
<tr>
<th>Density of Coating A</th>
<th>9.61</th>
<th>lbs/gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Projected Usage</td>
<td>806,925</td>
<td>gal/year</td>
</tr>
<tr>
<td></td>
<td>7,794,545</td>
<td>lbs/year</td>
</tr>
</tbody>
</table>

Projected Usage of Coating A (lbs) = 7,754,545 lbs/year

Foam density = 2.25 lbs/ft\(^3\) (from the guidance)

Volume of Air displaced = Amount of material processed per year/Foam Density

$V_{air} = 3,446,465 \text{ ft}^3/\text{year}$

Calculation of Process Temperature in Kelvin ($T_{proc}$)

<table>
<thead>
<tr>
<th>Process Temperature</th>
<th>95</th>
<th>°F</th>
</tr>
</thead>
<tbody>
<tr>
<td>$T_{proc}$</td>
<td>308.15</td>
<td>K</td>
</tr>
</tbody>
</table>

Calculation of Vapor Pressure of MDI @ $T_{proc}$ ($VP_{MDI}$) \(^2\)

$VP_{MDI} = 3.42E-05$ mm of Hg

Calculation of Adjustment Factor ($K_{MDI}$) = 1 assumed for worst case

Notes:

\(^1\) Source: Section 4.0, MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry, Alliance for Polyurethane Industry

\(^2\) Source: Appendix A, MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry, Alliance for Polyurethane Industry
May 26, 2021

Paul Wittbrodt
Ground Effects Incorporated
13204 Aboite Rd
Roanoke IN 46783

Re: Public Notice
Ground Effects, Inc.
Permit Level: MSOP Significant Permit Revision
(Minor PSD/EO) (120)
Permit Number: 003-43807-00399

Dear Paul Wittbrodt:

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 43807

and

IDEM’s Virtual File Cabinet (VFC): https://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/public-notices/

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 Roanoke Public Library, 314 N Main St, Ste 120, Roanoke IN 46783. 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 Alexandria Neuzerling, 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 2-6634 or dial (317) 232-6634.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
May 26, 2021

To: Roanoke Public Library 314 N Main St, Ste 120 Roanoke IN 46783

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: Ground Effects, Inc.
Permit Number: 003-43807-00399

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

May 26, 2021
Ground Effects, Inc.
003-43807-00399

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/public-notices/.

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.
**Mail Code 61-53**

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<td>IDEM Staff</td>
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<td>Ground Effects Incorporated</td>
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<td>003-43807-00399 (draft)</td>
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<td>1</td>
<td>Paul Wittbrodt</td>
<td>Ground Effects Incorporated 13204 Aboite Rd Roanoke IN 46783 (Source CAATS)</td>
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<td>Daniel &amp; Sandy Trimmer</td>
<td>15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
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<td>Duane &amp; Deborah Clark</td>
<td>Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)</td>
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<td>Mr. Jeff Coburn</td>
<td>Plumbers &amp; Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)</td>
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<td>Roanoke Public Library</td>
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<td>6</td>
<td>Roanoke Town Council</td>
<td>P.O. Box 328 Roanoke IN 46783 (Local Official)</td>
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<td>7</td>
<td>Allen Co. Board of Commissioners</td>
<td>200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)</td>
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<td>8</td>
<td>Fort Wayne-Allen County Health Department</td>
<td>200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)</td>
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<td>Lisa Green</td>
<td>The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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<td>5880 Gadsden Dr Plainfield IN 46168 (Affected Party)</td>
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<td>13</td>
<td>Roger &amp; Carolyn Reffe</td>
<td>13810 Lafayette Center Rd Roanoke IN 46783 (Affected Party)</td>
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<td>Pete Romzick GHD Services Inc.</td>
<td>26850 Haggerty Road Farmington Hills MI 48331 (Consultant)</td>
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