

AIR QUALITY PERMIT

Permit No.
3715-083-0015-B-01-0

Effective Date
May 24, 2016

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: **Vanguard National Trailer, Inc.**

Mailing Address: 289 East Water Tower Drive
Monon, IN 47959

is issued a Permit for the following:

The construction and operation of a truck trailer manufacturing facility

Facility Location: 8 Vanguard Drive
Trenton, Georgia 30752 (Dade County)

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 23752 dated March 23, 2016; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **5** pages.

[Signed]

Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not cause, let, suffer, permit, or allow the emission from any process, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

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2.2 The Permittee shall not cause, let, suffer, permit, or allow the emission from any process, contain particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below.
[391-3-1-.02(2)(e)1.(i)]

a. $E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

b. $E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;
P = process input weight rate in tons per hour.

2.3 The Permittee shall not perform at this facility spray application of any coating(s) that contains greater than 0.1% by mass of chromium (Cr) or cadmium (Cd), or greater than 1.0% by mass of lead (Pb), manganese (Mn) or nickel (Ni).
[Avoidance of 40 CFR Part 63, Subpart HHHHHH]

2.4 The Permittee shall not conduct paint stripping operations that use chemical strippers containing methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes.
[Avoidance of 40 CFR Part 63, Subpart HHHHHH]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

3.2 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions, and shall store all VOC-laden cleaning materials - including shop towels, rags and mop heads – in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition.

4. Process & Control Equipment

4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division.

4.2 The Permittee shall maintain an inventory of filter bags such that adequate supplies of bags are on hand to replace any defective bags in the fabric filters.

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- 4.3 The Permittee shall ensure particulate emissions from the paint spray booth (Emission Unit ID No. EU1) are controlled by fabric air filters (Air Pollution Control Device ID No. APCD) at all times the paint spray booth is in operation. The Permittee shall perform filter changes for these spray booth within 24 hours of whenever the static pressure drop across the filter systems falls outside the manufacturers recommended value.

5. Monitoring

- 5.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
- a. A differential pressure indicator on each paint booth fabric filter for measuring the differential pressure across the filter. Pressure drop (differential pressure) across each filter shall be recorded at least once per day during the operation of the paint spray booth. The Permittee shall record the pressure drop across each filter and ensure that it is within the manufacturer recommended range.

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
- b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

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7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment or any periods during which a continuous monitoring system or monitoring device is inoperative.
- 7.2 The Permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this Permit. The information shall be recorded in a permanent form suitable and available for inspection.
- 7.3 The Permittee shall maintain monthly usage records of all materials utilized at the entire facility containing VOC. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage records of any material disposed as containerized waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1(i)]
- 7.4 The Permittee shall use the monthly records required in Condition 7.3 to calculate the facility-wide VOC emissions during each calendar month. For purposes of this Permit, the facility-wide VOC emissions must include VOC emissions from the material usage, using mass balance.
[391-3-1-.02(6)(b)1(i)]
- 7.5 The Permittee shall maintain and update when necessary formulation data/records for all coatings being used in spray application at this facility. Such records shall include, but not to be limited to, MSDS and product data sheet (PDS) prepared for the coatings by the manufacturer(s) or supplier(s), and shall represent each target HAP compound in coatings that is present at 0.1% by mass or more in case of Cr or Cd, or at 1.0% by mass or more in case of Pb, Mn or Ni, as specified in Condition 2.3.
- 7.6 The Permittee shall maintain and update when necessary formulation data/records for all paint strippers used in removal of dried coatings from products. Such records shall include, but not to be limited to, MSDS and product data sheet (PDS) prepared for the paint strippers by the manufacturer(s) or supplier(s), and shall represent if any of the paint strippers contains methylene chloride (MeCl).

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8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall keep at the permitted facility the originals or complete copies of this Air Quality Permit and any subsequent Amendments to it.
- 8.3 The Permittee shall furnish the Division written notification of the initial startup date of this facility within fifteen (15) days of such date.