

**CONSTRUCTION PERMIT AND
ENHANCES NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT**

**Monaco Coach Corporation
1205 Lincoln Street
Nappanee, Indiana 46550**

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

Construction Permit No.: CP-039-10299-00087	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

A.1 General Information

The Permittee owns and operates a stationary fiberglass operation.

Responsible Official: Kurt Anderson
Source Address: 1205 Lincoln Street, Nappanee, Indiana 46550
Mailing Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SIC Code: 3083
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

This construction permit consists of the following emission units and pollution control devices:

- (a) One (1) fiberglass motor home parts manufacturing line, with a maximum production rate of 1.0 unit per hour, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausts to one (1) stack designated as GV42.
- (b) One (1) fiberglass prep and clean-up area, with a maximum parts throughput of 1.0 unit per hour and exhausts to one (1) stack designated as GV42.
- (c) One (1) sander, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.
- (d) Two (2) routers, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) This existing source has submitted their Part 70 (T-039-6116-00087) application on May 29, 1996. The equipment being reviewed under this permit shall be incorporated into the Part 70 permit after it is issued. If the facilities listed in this construction permit are not included in the issued Part 70 Operating permit, then the facilities may not be operated until the source files an administrative amendment to the Part 70 Operating permit.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

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

Construction Conditions [326 IAC 2-1-3]

B.1 General Construction Conditions

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

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

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

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

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

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Condition B.11, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

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

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

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

Operation Conditions

B.6 General Operation Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

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

- (a) The source's potential to emit of particulate matter (PM) is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the allowable emissions, potential emissions, or potential to emit, as appropriate, to the following:
 - 1.) 25 tons per year or more (326 IAC 2-1),

- 2.) 100 tons per year or more, and greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),
- 3.) 250 tons per year or more (326 IAC 2-2),

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

C.2 326 IAC 5 (Opacity Limitations):

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

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

C.3 Operation of Equipment [326 IAC 2-1-3]

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

Testing Requirements

C.4 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by the department, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements

C.5 Compliance Monitoring [326 IAC 2-1-3]

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

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

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

C.6 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps

C.7 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Record Keeping and Reporting Requirements

C.8 Annual Emission Reporting [326 IAC 2-6]

Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

C.9 Monitoring Data Availability [326 IAC 2-1-3]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-1-3]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location or the Wakarusa location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.11 General Reporting Requirements [326 IAC 2-1-3]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) an emergency as defined in 326 IAC 2-7-1(12); or
 - (3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 FACILITY CONDITIONS

- (a) One (1) fiberglass motor home parts manufacturing line, with a maximum production rate of 1.0 unit per hour, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausts to one (1) stack designated as GV42.
- (b) One (1) fiberglass prep and clean-up area, with a maximum parts throughput of 1.0 unit per hour and exhausts to one (1) stack designated as GV42.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

— Pursuant to 326 IAC 8-1-6 (General reduction requirements for new facilities)

- (a) Use of gel coats and resins containing volatile organic compounds (VOC) shall be limited such that the potential emissions of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, multiplying the other material usage rates by the percent VOC and summing those emissions for all gel coats, resins and all other VOC containing materials. Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) During the first 12 months of operation, the VOC emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.
- (c) Any increase of the VOC's potential emissions to 25 tons per year or more, shall require prior approval by the Office of Air Management (OAM).
- (d) Since the VOC's limited potential emissions are less than 25 tons per year, 326 IAC 8-1-6 does not apply to the fiberglass operation.

D.1.2 New Source Toxics Control [326 IAC 2-1-3.4]

— Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control):

- (a) Use of gel coats and resins containing Hazardous Air Pollutants (HAPs) shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive months and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each rolled on a monthly basis. Compliance with these limits shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. HAPs' emissions shall be calculated by multiplying the HAPs' usage of each gel coat and resin by the emission factor that is appropriate for the monomer content and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) During the first 12 months of operation, the single HAP emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 0.833 tons per month.
- (c) During the first 12 months of operation, the combination HAPs' emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.
- (d) Any increase of the single HAP potential to emit to 10 tons per year or greater or a combination HAPs' potential to emit to 25 tons per year or greater, shall require prior approval by the Office of Air Management (OAM).
- (e) Since the single HAP limited potential to emit is less than 10 tons per year and the combination HAPs' limited potential to emit is less than 25 tons per year, 326 IAC 2-1-3.4 does not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3]

- (d) Pursuant to 326 IAC 6-3 (Process Operations), the new fiberglass panel manufacturing line shall have a PM allowable emission using the following equation:

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

Where:

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the HAPs' limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the fiberglass manufacturing line is in operation.

D.1.7 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.
- (b) Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.8 Visible Emissions Notations

- (a) Weekly visible emission notations of the fiberglass manufacturing line at the point of exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
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- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-1-3]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permitted shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs' emission limits established in Condition D.1.1 and D.1.2.
 - (1) The amount of each resin and gel coat used. The VOC and mass weighted monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The weight of VOCs emitted for each compliance period;
 - (7) The total HAP usage for each month; and
 - (8) Method of application and other emission reduction techniques for each resin and gel coat use for each month.
- (b) To document compliance with Condition D.1.7, the Permitted shall maintain a log of weekly overspray observations, monthly and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) To document compliance with D.1.8, the Permitted shall maintain records of weekly visible emission notations of the fiberglass panel manufacturing line stack exhaust.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY CONDITIONS

- (a) One (1) sander, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.
- (b) Two (2) routers, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.

Emissions Limitation and Standards

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

- (a) The two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour each and are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each.

Compliance Determination Requirements

D.2.2 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**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 FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?____, 100 LBS/HR VOC ?____, 100 LBS/HR SULFUR DIOXIDE ?____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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: Monaco Coach Corporation PHONE NO. (219)862-7313

LOCATION: Nappanee/Elkhart

PERMIT NO. 039-10299 AFS PLANT ID: 039-00087 AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT MITTED 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: _____

FAX NUMBER - 317233-5967

**Please note - 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.**

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

—

—

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

Quarterly Report

Company Name: Monaco Coach Corporation
Location: 1205 Lincoln Street, Nappanee, Indiana 46550
Permit No.: 039-10299-00087
Source: Fiberglass Operation
Pollutant: VOC Emissions (includes volatile organic HAP from resins and gel coats)
Limit: Less than 25 tons per twelve month period

Year: _____

Month	Usage (tons/month)	Usage for previous month (tons)	Usage for previous twelve month period (tons)	Emissions (tons/month)	Emissions for previous month (tons)	VOC Emissions for previous twelve month period (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
 Office of Air Management
 Compliance Data Section**

Quarterly Report

Company Name: Monaco Coach Corporation
 Location: 1205 Lincoln Street, Nappanee, Indiana 46550
 Permit No.: 039-10299-00087
 Source: Fiberglass Operation
 Pollutant: Single HAP and Combination HAP PTE
 Limit: Less than 10 tons per twelve month period for a single HAP
 Less than 25 tons per twelve month period for a combination HAPs

Year: _____

Month	Usage (tons/month)	Usage for previous month (tons)	Usage for previous twelve month period (tons)	Emissions (tons/month)	Emissions for previous month (tons)	PTE for previous twelve month period (tons)

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Monaco Coach Corporation
 Source Location: 1205 Lincoln Street, Nappanee, Indiana 46550
 County: Elkhart
 Construction Permit No.: CP-039-10299-00087
 SIC Code: 3083
 Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Monaco Coach Corporation relating to the construction and operation of a fiberglass operation, consisting of the following equipment:

- (a) One (1) fiberglass motor home parts manufacturing line, with a maximum production rate of 1.0 unit per hour, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausts to one (1) stack designated as GV42.
- (b) One (1) fiberglass prep and clean-up area, with a maximum parts throughput of 1.0 unit per hour and exhausts to one (1) stack designated as GV42.
- (c) One (1) sander, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.
- (d) Two (2) routers, with a maximum fiberglass throughput of 75 pounds per hour, controlled by dry filters and exhausts to one (1) stack designated as GV42.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
GV42	fiberglass line	15	2	15,000	ambient

Recommendation

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

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

An application for the purposes of this review was received on October 30, 1998, with additional information received on November 17, 1998 and November 30, 1998.

Emissions Calculations

Potential VOC emissions:

- (1) Resin potential VOC/styrene emissions = (100 lb/hr * 0.036 (CFA emission loss)) + 7.5 lb/hr * 0.07 (CFA emission loss) = 4.125 lb/hr; 4.125 lb/hr * 8760 hr/yr * ton/2000 lb = 18.07 ton/yr.
- (2) Gel Coat potential VOC/styrene emissions = 31 lb/hr * 0.188 (CFA emission loss) = 5.83 lb/hr ; 5.83 lb/hr * 8760 hr/yr * ton/2000 lb = 25.5 ton/yr.
- (3) Catalyst potential VOC emissions = 3.25 lb/hr * 0.44 (percent VOC) = 1.43 lb/hr; 1.43 lb/hr * 8760 hr/yr * ton/2000 lb = 6.26 ton/yr.
- (4) Wax/Mold Release potential VOC emissions = 0.421 lb/hr; 0.421 lb/hr * 8760 hr/yr * ton/2000 lb = 1.84 ton/yr.

Total potential VOC emissions = 51.67 ton/yr.
Total potential styrene emissions = 43.57 ton/yr.

Potential PM/PM₁₀ emissions:

- (1) Routers and Grinder PM/PM₁₀ emissions = 1.0 lb/hr collected (estimated) /0.95 (efficiency) = 1.05 lb/hr potential; 1.05 lb/hr * 8760 hr/yr * ton/2000 lb = 4.61 ton/yr.
- (2) Fiberglass PM/PM₁₀ emissions = 1.89 tons per year (source's estimated actual emissions) * 8760 hr/2000 hr (actual) = 8.27 tons per year.

Total PM/PM₁₀ emissions = 12.88 tons per year.

Total Potential and Allowable Emissions

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

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	--	12.88
Particulate Matter (PM10)	--	12.88
Sulfur Dioxide (SO ₂)	--	--
Volatile Organic Compounds (VOC)	--	51.67
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO _x)	--	--
Styrene	--	43.57
Combination of HAPs	--	43.57

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.
- (1) The new fiberglass manufacturing line shall have PM allowable emissions using the following equation:
- $E = 4.10 P^{0.67}$ Where: E = PM allowable emissions in pounds hour; and
P = Process weight rate in tons per hour.
- (2) The two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour each, are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each. These facilities comply with 326 IAC 6-3 without the use of control equipment.
- (b) The potential emissions before control are less than or equal to the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for PM₁₀, NO_x, SO₂ and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	15.99
PM10	8.54
SO ₂	0.00
VOC	124.5
CO	0.00
NO _x	0.88

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Part 70 application submitted by the company on May 29, 1996.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.23	0.23	0.00	Less than 25	0.00	0.00
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-039-6116-00087) application on May 29, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application. If the facilities listed in this construction permit are not included in the issued Part 70 Operating permit, then the facilities may not be operated until the source files an administrative amendment to the Part 70 Operating permit.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.
- (b) There are no NESHAP 40 CFR Part 63 applicable to this facility.

State Rule Applicability

326 IAC 1-5-2 and 326 IAC 1-5-3 (Emergency Reduction Plans):

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

The source is subject to 326 IAC 1-5-2 and 1-5-3 because the source's VOC PTE is greater than 100 tons per year.

326 IAC 2-6 (Annual Emission Reporting):

Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

The source is subject to 326 IAC 2-6 because they are located in Elkhart County and the VOC PTE is greater than 10 tons per year.

326 IAC 2-1-3.4 (New source Toxics Control):

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control):

- (a) Use of gel coats and resins containing styrene shall be limited such that the potential to emit (PTE) of styrene shall be less than ten (10) tons per twelve (12) consecutive months, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. Styrene emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) Any increase of the styrene's potential to emit to 10 tons per year, shall require prior approval by the Office of Air Management (OAM).
- (c) Since the styrene's potential to emit is less than 10 tons per year, 326 IAC 2-1-3.4 does not apply.

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

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

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

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations), the following applies:

- (a) The new fiberglass manufacturing line shall have PM allowable emissions using the following equation:

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

Where: E = PM allowable emissions in pounds hour;
and

P = Process weight rate in tons per hour.

- (b) The two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour, are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each. These facilities comply with 326 IAC 6-3 without the use of control equipment.
- (c) The dry filters for particulate matter overspray control shall be in operation at all times when the fiberglass line is in operation.
- (d) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) Monthly inspections shall be performed of the fiberglass manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (f) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (g) Weekly visible emission notations of the fiberglass manufacturing line stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (h) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (i) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (j) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (k) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

326 IAC 8-1-6 (General reduction requirements for new facilities):

Pursuant to 326 IAC 8-1-6 (General reduction requirements for new facilities)

- (b) Use of gel coats and resins containing volatile organic compounds (VOC) shall be limited such that the potential to emit (PTE) of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, multiplying the other material usage rates by the percent VOC and summing those emissions for all gel coats, resins and all other VOC containing materials. Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) Any increase of the VOC's potential to emit to 25 tons per year, shall require prior approval
- (c) Since the VOC's potential to emit is less than 25 tons per year, 326 IAC 8-1-6 does not apply to the fiberglass operation.

No other 326 IAC 8 rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxic on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This new fiberglass operation will emit levels of air toxic less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (d) 326 IAC 2-1-3.14 does not apply because the limited potential to emit of single HAP is less than 10 tons per year the combination of HAPs is less than 25 tons per year.

Conclusion

The construction of this fiberglass operation will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-10299-00087**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Monaco Coach Corporation
 Source Location: 1205 Lincoln Street. Nappanee, Indiana 46550
 County: Elkhart
 Construction Permit No.: CP-039-10299-00087
 SIC Code: 3083
 Permit Reviewer: Nysa L. James

On December 21, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Monaco Coach Corporation had applied for a construction permit to construct and operate a fiberglass operation with dry filters as control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 12, 1999, Monaco Coach Corporation submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: Paragraph B.1(a), page 5 of 21 would require Monaco to notify IDEM "prior to any proposed change in construction which may affect allowable emissions". This provision is clearly overly broad and beyond IDEM's authority because it would require Monaco to receive approval even if the proposed change resulted in a decrease in emissions. For this reason, the second sentence in paragraph B.1(a) should be revised to replace the word "affect" with the word "increase" prior to the phrase "allowable emissions".

Response 1: Condition B.1(a), General Construction Conditions located on page 5 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

B.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may ~~affect~~ **increase the** allowable emissions, the change must be approved by the Office of Air Management (OAM).

Comment 2: The first sentence of paragraph B.8(c), page 6 of 21, should be deleted and replaced with the following sentence: "Failure to report a failure of any emission control equipment subject to the requirements of 326 IAC 1-6 shall constitute a violation of 326 IAC 1-6, and any other applicable rules." The sentence as proposed by IDEM does not accurately reflect the requirements of 326 IAC 1-6-2.

Response 2: Condition B.8(c), Malfunctions Report located on page 6 of 21, is amended to the following to reflect the requirements of 326 IAC 1-6-2 in the most accurate manner (changes are bolded and crossed out for emphasis):

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

Comment 3: Paragraph B.9(b) should be revised to insert the phrase “or operator” after the phrase “current owner” and before the phrase “to the new owner”. This revision is necessary to accurately reflect the provisions of 326 IAC 2-1-6(a) which allow either the current owner or the current operator at the time of permit transfer to perform the transfer.

Response 3: Condition B.9(b), Transfer of Permit located on page 7 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (b) The written notification shall be sufficient to transfer the permit from the current owner **or operator** to the new owner.

Comment 4: Paragraph B.10(e) should be deleted and replaced with the following to more accurately reflect the requirements of 326 IAC 2-1-9(a)(5): “For any other cause which establishes in the judgement of the commissioner, the fact that the continuance of this permit is not consistent with the purposes of 326 IAC 2-1”.

Response 4: Condition B.10(e), Permit Revocation located on page 7 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (e) For any **other** cause which establishes in the judgment of ~~IDEM~~ **the commissioner**, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Comment 5: The first sentence of paragraph C.1(b) should be deleted and replaced with the following: “Any change or modification which may increase the allowable emissions, potential emissions, potential to emit, as appropriate, to the following:”. The revised phrase is necessary because two of the three regulations referenced in the subparagraphs to C.1(b) do not reference “potential emissions”.

Response 5: Condition C.1(b), PSD Minor Source Status located on page 8 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (b) Any change or modification which may increase the **allowable emissions, potential emissions, or potential to emit, as appropriate**, to the following:
- 1.) 25 tons per year or more (326 IAC 2-1),
 - 2.) 100 tons per year or more, and greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),
 - 3.) 250 tons per year or more (326 IAC 2-2),

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

- Comment 6: Paragraph C.2 should be deleted in its entirety and replaced with the following:
- (a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
 - (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period."

This revision is necessary to clarify the relationship between the limitation and the relevant time period and to be consistent with 326 IAC 5-1-2.

- Response 6: On November 1, 1998, 326 IAC 5-1-2 was revised as reflected in Condition C.2 (Opacity Limitations). A copy of this updated rule can be located on IDEM's web page "www.state.in.us/idem". Condition C.2 is the most up to date and accurate reflection of 326 IAC 5 (Opacity Limitations).

- Comment 7: The first and second sentences in paragraph C.4(b) should be revised as discussed below to accurately reflect the language found in 326 IAC 3-6-4(b). In the first sentence, the word "within" found between the phrases "IDEM, OAM" and "forty-five (45) days" should be replaced with the phrase "no later than". In the second sentence, the word "Commissioner" located between the phrases "granted by the" and "if the source" should be replaced with the word "department". Additionally, the word "within" found between the phrases "written explanation" and "five (5) days" in the second sentence should be replaced with the phrase "no later than".

- Response 8: Condition C.4(b), Performance Testing located on page 9 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (b) All test reports must be received by IDEM, OAM ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **department**, if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

- Comment 9: The final sentence of paragraph C.7(c) should be deleted in its entirety. 326 IAC 1-5-2 does not contain any provision allowing IDEM to supply an ERP to the source.

- Response 9: Condition C.7(c) , Emergency Reduction Plan located on page 9 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.~~

- Comment 10: Paragraph C.8 should be deleted and replaced in its entirety with the following:
"Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The Permittee shall comply with the applicable requirements of 326 IAC 2-6.”

IDEM has previously proposed modifying 326 IAC 2-6 which could change the reporting requirements for sources. Monaco believes the proposed revision is necessary to prevent the possibility that the permit would require reporting requirements which may become inconsistent with the applicable regulation.

Response 10: IDEM, OAM has not changed the reporting requirements of 326 IAC 2-6 at the time of this review. The applicable regulation for the statement submittal, 326 IAC 2-6-3, requires the source to submit by April 15. The minimum requirements needed in this statement are under 326 IAC 2-6-4. The emission statement operating year, December 1 through November 30, is defined under 326 IAC 2-6-2(8).

Comment 11: The second sentence of paragraph C.10(a), should be revised and the word “source” between “kept at the” and “location and available” be changed to “local administrative support”. Monaco provides administrative support to this manufacturing facility through their Wakarusa location, located less than 10 miles away. Primary records are not kept at Nappanee location because of the close proximity of the Wakarusa facilities.

Response 11: C.10(a), General Record Keeping Requirements located on page 11 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **or the Wakarusa location**, and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

Once the Part 70 permit is issued to the source, the source will have to maintain these records at the source’s location for a minimum of three (3) years. This requirement for Part 70 permits, is addressed under 326 IAC 2-7-5(3) and 2-7-6.

Comment 12: Paragraph D.1.1 should be revised to change the term potential to emit (PTE) to potential emissions. This revision is necessary because 326 IAC 8-1-6 applies to new facilities with potential emissions above a certain level and the term “potential emissions” is specifically defined in 326 IAC 1-2-55. The word styrene should be revised to VOCs and the emission limit should be revised from 0.833 tons per month to 2.083 tons per month.

Response 12: Condition D.1.1, VOC 326 IAC 8-1-6 located on page 13 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General reduction requirements for new facilities)

- (a) Use of gel coats and resins containing volatile organic compounds (VOC) shall be limited such that the potential ~~to emit (PTE) emissions~~ of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:

- (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, multiplying the other material usage rates by the percent VOC and summing those emissions for all gel coats, resins and all other VOC containing materials. Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) During the first 12 months of operation, the ~~styrene~~ **VOC** emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than ~~0.833~~ **2.08** tons per month.
 - (c) Any increase of the VOC's potential ~~to emit emissions~~ to 25 tons per year **or more**, shall require prior approval by the Office of Air Management (OAM).
 - (d) Since the VOC's limited ~~potential to emit emissions is are~~ less than 25 tons per year, 326 IAC 8-1-6 does not apply to the fiberglass operation.

Comment 13: Paragraph D.1.2(b) should be revised as follows to change the pollutant VOC to styrene and to correct the emission rate. The word "VOC" located between the words "the" and "emission" should be changed to "styrene" and the number "2.08" located between the phrases "shall be less than" and "tons per month" should be changed to 0.833.

Response 13: Condition D.1.2, New Source Toxics Control located on page 13 and 14 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.2 New Source Toxics Control [326 IAC 2-1-3.4]

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control):

- (a) Use of gel coats and resins containing ~~styrene~~ **Hazardous Air Pollutants (HAPs)** shall be limited such that the potential to emit (PTE) of ~~styrene a single HAP~~ shall be less than ten (10) tons per twelve (12) consecutive months **and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each** rolled on a monthly basis. Compliance with ~~the these~~ limits shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. ~~Styrene HAPs'~~ **HAPs'** emissions shall be calculated by multiplying the **HAPs'** usage of each gel coat and resin by the emission factor that is appropriate for the monomer content and summing the emissions for all gel coats and resins.

Emission factors shall be obtained from the reference approved by IDEM, OAM (specified below).

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, July, 1998.
- (b) During the first 12 months of operation, the ~~VOG single HAP~~ emissions shall be limited such that the ~~total~~ emissions divided by the accumulated months of operation shall be less than ~~2.08~~ **0.833** tons per month.
- (c) **During the first 12 months of operation, the combination HAPs' emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.**
- (d) Any increase of the ~~styrene's single HAP~~ potential to emit to 10 tons per year **or greater or a combination HAPs' potential to emit to 25 tons per year or greater**, shall require prior approval by the Office of Air Management (OAM).
- (e) Since the ~~styrene's single HAP~~ limited potential to emit is less than 10 tons per year **and the combination HAPs' limited potential to emit is less than 25 tons per year**, 326 IAC 2-1-3.4 does not apply.

The OAM has changed the word "styrene" to "Hazardous Air Pollutant (HAP)", since it is possible for the source to substitute styrene with some other HAP. The OAM believes that leaving the word "styrene" would be too restrictive to the operations of the fiberglass line and therefore has made the above changes.

The combination of HAPs limit has been added to ensure that the fiberglass operation will not exceed this threshold as cited under 326 IAC 2-1-3.4. The reporting form has been changed accordingly.

Comment 14: Paragraph D.1.7(a) should be deleted in its entirety and replaced with the following: "Operator's of the spray equipment and particulate control systems will be trained in the proper use and operation of the equipment. Training shall be documented and refreshed annually." The following paragraphs, D.1.7(b) and (c) shall be renumbered accordingly.

Response 14: The OAM believes that checking the placement and integrity of the filters once a week is a very effective means of ensuring proper operation and ongoing compliance with 326 IAC 6-3. The OAM has re-evaluated the compliance monitoring provisions related to evidence of actual emissions from the fiberglass operation and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly and the inspections of air pollution control equipment has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. However, a compliance response plan is not necessary for this construction permit, but will necessary for the source's Part 70 permit.

Condition D.1.7, Monitoring located on pages 14 and 15 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.7 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (b) Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 15: Paragraph D.1.8, Visible Emissions Notations, should be deleted in its entirety.

Response 15: The OAM believes that weekly visible emissions notations are a very effective means of ensuring proper operation and ongoing compliance with 326 IAC 5. The OAM has re-evaluated the compliance monitoring provisions related to evidence of actual emissions from the fiberglass operation and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. However, a compliance response plan is not necessary for this construction permit, but will necessary for the source's Part 70 permit. Condition D.1.8(e), Monitoring located on pages 15 of 21, is deleted from the construction permit.

Comment 16: Paragraph D.1.9(a)(1) should be revised to add the following sentence at the end of the paragraph: "Acetone usage shall not require record keeping or tracking requirements."

Response 16: This requested language is not necessary since acetone is not considered a volatile organic compound, therefore the above listed does not need to be added.

Comment 17: Paragraphs D.1.9(b) and (c) should be deleted in their entirety because they reference Monitoring and Visible Emission conditions which should not be incorporated into the permit. The following paragraph should be renumbered.

Response 17: As stated in responses 14 and 15, Condition D.1.7(a) and D.1.8 remain in effect and unchanged, therefore the record keeping requirements will remain in effect and unchanged.

Comment 18: Under Section D.2, paragraphs D.1.1 and D.1.2 should be renumbered to D.2.1 and D.2.2.

Response 19: The OAM has changed accordingly.

Comment 20: Paragraph D.2.1 should be revised from “are not regulated by 326 IAC 6-1 or any New Source Performance Standards, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each ”to are not regulated by 326 IAC 6-1 or any New Source Performance Standards”.

Response 20: If the facility is subject to 326 IAC 6-3, and its process weight rate is less than 100 lbs./hour, it must meet the allowable emission rate for a power of 100 lbs/hour. The OAM believes this is a logical interpretation of the rule. It also allows individual small facilities that are subject only to 326 IAC 6-3 and general opacity rules to be treated as unlisted insignificant activities.

Comment 21: The revisions to the permit, which have been previously discussed, should also be made to the corresponding portions of the TSD.

Response 21: The Office of Air Management (OAM) corrects permit errors in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 22: The PM and PM10 emissions identified in the tables found in the “Proposed Modification” section should be corrected from 0.23 tons per year to 12.88 tons per year.

Response 22: The Proposed Modification section is for determining if PSD is applicable and then listing the PSD potential to emit. In making this determination the emissions are taken after control. The potential PM or PM10 emissions of the fiberglass operation are 12.88 tons per year, but the after control emissions are 0.23 tons per year.

Upon further review, OAM has made the following changes (changes are bolded and crossed out for emphasis):

1. Condition D.1.5, Testing Requirements located on page 14 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.5 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the ~~Styrene HAPs~~ **HAPs** limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

This condition has been changed to be consistent with the changes made to condition D.1.2.

2. Condition D.1.9, Record Keeping Requirements located on pages 15 and 16 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permitted shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and ~~styrene~~ **HAPs** emission limits established in Condition D.1.1 and D.1.2.
- (1) The amount of each resin and gel coat used. The VOC and mass weighted monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The weight of VOCs emitted for each compliance period;
 - (7) The total ~~styrene~~ **HAP** usage for each month; and
 - (8) Method of application and other emission reduction techniques for each resin and gel coat use for each month.
- (b) To document compliance with Condition D.1.7, the Permitted shall maintain a log of ~~daily~~ **weekly** overspray observations, ~~daily~~ **monthly** and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with D.1.8, the Permitted shall maintain records of ~~daily~~ **weekly** visible emission notations of the fiberglass panel manufacturing line stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

This condition has been changed to be consistent with the changes made to condition D.1.2 and to be consistent with conditions D.1.7 and D.1.8.

3. Condition D.2.2, Testing Requirements located on page 17 of 21, is amended to the following (changes are bolded and crossed out for emphasis):

D.2.2 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition ~~D.1.4~~ **D.2.1** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.