

Mr. Brian Shea
Gulf Stream Coach, Inc.
503 S. Oakland
Nappanee, Indiana 46550

Re: 039-10669-00145
Administrative Amendment to
CP 039-9271-00145

Dear Mr. Shea:

Gulf Stream Coach, Inc. was issued a permit on December 23, 1998 for a motor home, bus, van, pick-up truck and travel trailer fabrication and assembly operation. A letter notifying the Office of Air Management of an amendment was received on February 17, 1999. Pursuant to the provisions of 326 IAC 2, the permit is hereby revised as follows:

Gulf Stream Coach, Inc., requests that Condition D.1.9(a)(2) and (3) be removed from the permit because they believe that record keeping requirements are unnecessary and over burdensome.

Upon review of the requirements of Section D.1, it is determined that D.1.9(a)(2) and D.1.9(a)(3) are not required.

Condition D.1.9(a)(2) requires the source to keep a log of the dates of use. This requirement is not necessary because the limitations of Conditions D.1.1 and D.1.2 are monthly limitations and because a log of the dates of use is not necessary to demonstrate compliance with Conditions D.1.1 and D.1.2.

The limitations of Conditions D.1.1 and D.1.2, at most, require the source to keep monthly records, not records every time they use a particular coating or solvent. Further, a log of the dates of use are simply not necessary to demonstrate compliance with Conditions D.1.1 and D.1.2. The limitations of Conditions D.1.1 and D.1.2 consist of a VOC content limit of the primecoats, basecoats, and topcoats applied, and input VOC and HAP emission limits, rolled on a monthly basis. Compliance with the VOC content limitations of Conditions D.1.1 and D.1.2 are demonstrated sufficiently via the record keeping requirements of Condition D.1.9(a)(1). Compliance with the VOC and HAP usage limits of Conditions D.1.1 and D.1.2 are demonstrated via Conditions D.1.9(a)(4) and (5). Thus, Condition D.1.9(a)(2) shall be removed.

Condition D.1.9(a)(3) requires the source to keep records of volume weighted VOC content of the coatings used for each month. This requirement is not necessary because none of the limits of Conditions D.1.1 or D.1.2 require the volume weighted VOC content of the coatings to demonstrate compliance. Thus, the volume weighted content records of Condition D.1.9(a)(3) and the associated weighted content limit of Condition D.1.9(a)(6), shall be removed.

Condition D.1.9 shall therefore be amended as follows:

D.1.9 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ below. Records maintained for (1) through ~~(6)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount and VOC and HAP content of each coating material and solvent 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 and HAP usage for each month; and
 - ~~(6) The weight of VOCs and HAPs emitted for each compliance period.~~
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The proposed changes do not relax any existing conditions, increase the source potential to emit, or trigger any new applicable requirements.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5693), or dial (317) 233-5693.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
SDF

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - G. Wingstrom, D. Elliott
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Gulf Stream Coach, Inc.
503 S. Oakland
Nappanee, Indiana 46550**

This 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-039-9271-00145	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: 12-23-98
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Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC and HAP content of each coating material and solvent 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) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) 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.