

Mr. George Philley
Starcraft RV
P. O. Box 458
Topeka, Indiana, 46571

Re: AA 087-10700
First Administrative Amendment to
Part 70 T087-7472-00007

Dear Mr. George Philly:

An application requesting an enhanced new source review/construction permit was received on December 19, 1998. Starcraft RV was issued a construction permit/enhanced new source review (CP 087-10279-00007) for the addition of a melt glue operation and a repair paint booth. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows:

The enhanced new source review/construction permit CP 087-10279-0007 will cause additions to the Title V to be amended in section A.2 and section D.4.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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 Shanty Pahi at (800) 451-6027, press 0 and ask for Shanty Pahi or extension (2-0868), or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Revised and new Part 70 permit pages(six Pages)

Spahi

cc: File - LaGrange County
U.S. EPA, Region V
LaGrange County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Starcraft RV
536 Michigan Street
Topeka, Indiana 46571**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T087-7472-00007	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 25, 1999
First Administrative Amendment: 087-10700	Pages Affected: 6a,37a,b,c,d and e.
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

A.2 Emission Units and Pollution Control Equipment Summary

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

- (f) One (1) hot melt glue operation with a maximum capacity of 4.50 units per hour, using a raw material of 325.0 pounds plywood per hour, 330.0 pounds of fiberglass panels per hour, exhausting through a stack identified as SV-29;
- (g) One (1) RV Campers repair paint booth identified as PB₄, with a maximum capacity of 2.0 recreational vehicles (RV) per hour, consisting of two (2) paint pots, one (1) wash tank for paint guns, one (1) air atomized wash gun, five (5) air atomized cup guns identified as PGRV-001 through PGRV-005 utilized for wood and plastic substrates only, particulate matter (PM) controlled by a dry filters, exhausting through a stack identified as SV-28.

SECTION D.4 FACILITY OPERATION CONDITIONS

- (a) One (1) hot melt glue operation with a maximum capacity of 4.50 units per hour, using a raw material of 325.0 pounds plywood per hour, 330.0 pounds of fiberglass panels per hour, exhausting through a stack identified as SV-29;
- (b) One (1) RV Campers repair paint booth identified as PB₄, with a maximum capacity of 2.0 recreational vehicles (RV) per hour, consisting of two (2) paint pots, one (1) wash tank for paint guns, one (1) air atomized wash gun, five (5) air atomized cup guns identified as PGRV-001 through PGRV-005 utilized for wood and plastic substrates only, particulate matter (PM) controlled by a dry filters, exhausting through a stack identified as SV-28.

Emission Limitations and Standards

D.4.1 Hazardous Air Pollutant (HAPs) Limitation

- (a) The input of each single hazardous air pollutant (HAP) and combined hazardous air pollutants including clean up solvent, minus solvent shipped outside, delivered to the applicators of the hot melt glue operation shall be limited to less than 10.0 and 25.0 tons per year, rolled on a monthly basis, respectively. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the 0.75 for single hazardous air pollutant and 2.0 for combined hazardous air pollutants (HAPs), respectively.

D.4.2 Volatile Organic Compounds (VOC) Limitation

- (c) The input VOC including clean up solvent, minus VOC solvent shipped outside, delivered to the applicators of the hot melt glue operation shall be limited to less than 25.0 tons per year, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- (d) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the 2.0 tons.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the hot melt glue operation, and paint booth No. 4 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility identified as Paint Booth No. 4.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint booth No. 4 is in operation.

D.4.7 Monitoring

- (a) Daily 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 from the surface coating booth stack (SV-28) while one or more of the booths are 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 coating 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 a noticeable change in overspray emission, or evidence of overspray 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.

Record Keeping and Reporting Requirements

D.4.8 Record Keeping Requirements [326 IAC 2-1-3]

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1 and D.4.2.
 - (1) The amount and VOC 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;

Starcraft RV
Topeka, Indiana
Permit Reviewer: Manoj P Patel

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- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain a log of weekly overspray observations, weekly 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.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

ENSR/ Construction Permit Quarterly Report

Source Name: Starcraft RV
Source Address: 536 Michigan Street, Topeka, Indiana 46571
Mailing Address: P. O. Box 458, Topeka, Indiana 46571
Construction Permit No.: ENSR / CP: 087-10279-00007
Facility: Hot Melt Glue Operation
Parameter: Single HAP & Combined HAPs Limitations
Limit: Single HAP: less than 10 tons/year, Combined HAP: less than 25 tons/year
First Year Limit: Single HAP: 0.75 ton/month, Combined HAP: 2 tons/month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 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**

ENSR/ Construction Permit Quarterly Report

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Source Address: 536 Michigan Street, Topeka, Indiana 46571
Mailing Address: P. O. Box 458, Topeka, Indiana 46571
Construction Permit No.: ENSR / CP: 087-10279-00007
Facility: Hot Melt Glue Operation
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25.0 tons per 12 month period
First Year Limit: 2.0 tons per month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
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