

Mr. Tom Peck  
Starcraft Automotive Corporation  
P.O. Box 1903  
Goshen, IN 46526

Re: 039-12782  
First Administrative Amendment  
To Part 70 permit no: 039-6130-00011

Dear Mr. Tom Peck:

Starcraft Automotive Corporation was issued a permit on June 17, 1999 for a stationary custom recreational vehicle manufacturing plant. A letter requesting a significant source modification (039-12642) was received on August 21, 2000. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

## **SECTION A SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom recreational vehicle manufacturing plant, that converts stock vans to conversion vans.

Responsible Official: **Tom Peck** ~~Joe Custer~~  
Source Address: 2703 College Avenue, Goshen, Indiana 46526  
Mailing Address: P.O. Box 1903, Goshen, Indiana 46526  
SIC Code: 3716  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.
- (b) Two (2) sealer booths, identified as EU-38 and EU39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray

system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.

- (c) One (1) fiberglass priming booth (**West Primer Area**), identified as EU-45, emitting to stack **SV-14** ~~SV-12~~. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.
- (d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.
- (e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.
- (f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.
- (g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.
- (h) **One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.**
- (i) **One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.**
- (j) **One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.**
- (k) **One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.**
- (l) **An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.**

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.
- (b) Two (2) sealer booths, identified as EU-38 and EU-39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.
- (c) One (1) fiberglass priming booth (**West Primer Area**), identified as EU-45, emitting to stack **SV-14** ~~SV-12~~. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.
- (d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.
- (e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.
- (f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.
- (h) **One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.**
- (i) **One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.**
- (j) **One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.**
- (k) **One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions. )

**D.1.3 Volatile Organic Compounds [326 IAC 8-2-9 (Miscellaneous Metal Coating)]**

- (a) The volume weighted average volatile organic compound (VOC) content of coating applied to steel from the fabrication area (FE-1, FE-2, FE-3, and FE-5) **and the North Primer Booth (EU-41)** shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.9 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, daily observations shall be made of the overspray from the surface coating booth stacks (SV-7, 8, **10, 11, 12, 15, 16, 17, 18, 19, 20, 21, 25, and 26, 37 and 38**) while one or more of the booths being controlled 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.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

- (g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.
- (l) **An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions. )

**D.2.6 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking shop, at least once weekly when the woodworking shop is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of **1.0 to 2.5** ~~3.0 and 6.0~~ inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

#### Attachments

ERG/EG

cc: File - Elkhart  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector - Greg Wingstrom  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

## Starcraft Automotive Corporation 2703 College Avenue Goshen, Indiana 46526

(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.: T 039-6130-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 17, 1999

First Significant Permit Modification, SPM 039-11338-00011 issued on April 20, 2000

First Significant Source Modification, SSM 039-12642-00011 issued on **(need date)**

First Administrative Amendment No: 039-12782-00049	Pages Affected: 5, 5a, 27, 27a, 28, 29, 30, 30a, 31, 31a
Issued by: Paul Dubenetzky, Permits 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). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a stationary custom recreational vehicle manufacturing plant, that converts stock vans to conversion vans.

Responsible Official: Tom Peck  
Source Address: 2703 College Avenue, Goshen, Indiana 46526  
Mailing Address: P.O. Box 1903, Goshen, Indiana 46526  
SIC Code: 3716  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

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

- (a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.
- (b) Two (2) sealer booths, identified as EU-38 and EU-39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.
- (c) One (1) fiberglass priming booth (West Primer Area), identified as EU-45, emitting to stack SV-14. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.
- (d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.
- (e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.

- (f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.
- (g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.
- (h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.
- (i) One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.
- (j) One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.
- (k) One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.
- (l) An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) natural gas fired boilers, rated at four point two (4.2) million British thermal units per hour (MMBtu/hr), exhausting at three stacks identified as 30, 31, and 32.
- (b) Two (2) natural gas fired boilers, rated at six point two seven eight (6.278) million British thermal units per hour (MMBtu/hr), exhausting at two stacks identified as 33 and 34.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is 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); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.
- (b) Two (2) sealer booths, identified as EU-38 and EU39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.
- (c) One (1) fiberglass priming booth (West Primer Area), identified as EU-45, emitting to stack SV-14. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.
- (d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.
- (e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.
- (f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.
- (h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.
- (i) One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.
- (j) One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.
- (k) One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions. )

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.1.1 Minor Source for Prevention of Significant Deterioration (PSD) 326 [IAC 2-2 and 40 CR 52.21]**

The sourcewide Volatile Organic Compounds (VOC) input usage, shall be limited to less than 250 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit will make 326 IAC 2-2, PSD and 40 CFR 52.21 not applicable.

#### **D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to CP 039-2790-00011, issued on April 21, 1994, the BACT determined for the one (1) paint booth with four (4) partitions, identified as EU-49, EU-50, EU-51, and EU-52 shall be as follows:

- (a) The use of High Volume Low Pressure (HVLP) spray system, and airless spray system; and
- (b) The VOC input usage shall be limited to 134 tons per twelve-month period, rolled on a monthly basis.

Compliance with this limit shall make 326 IAC 8-1-6 (General Reduction Requirements) not applicable.

D.1.3 Volatile Organic Compounds [326 IAC 8-2-9 (Miscellaneous Metal Coating)]

- (a) The volume weighted average volatile organic compound (VOC) content of coating applied to steel from the fabrication area (FE-1, FE-2, FE-3, and FE-5) and the North Primer Booth (EU-41) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for extreme performance coatings.
- (b) The volume weighted average of the volatile organic compound (VOC) content of coatings used shall be determined using the following equation:

$$\text{lb/gal less water} = \frac{\text{Coating } ([D * O * Q / (1-w * Dc/Dw)])}{C}$$

Where: Dc = density of coating Dw = density of water  
O = weight % organics Q = quantity of coating, gal/unit  
W = percent volume water C = total coatings used, gal/unit

- (c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets from paint booths EU-38, EU-39, EU-56 and EU-57 shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to this rule, the PM overspray from the surface coating booths 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:

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

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.6 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 and any control devices.

### **Compliance Determination Requirements**

#### D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitation contained in Conditions D.1.1, D.1.2 and D.1.3 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 [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.1.9 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, daily observations shall be made of the overspray from the surface coating booth stacks (SV-7, 8, 10, 11, 12, 15, 16, 17, 18, 19, 20, 21, 25, 26, 37 and 38) while one or more of the booths being controlled 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) Weekly 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.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.
- (l) An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions. )

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 3.96 pounds per hour when operating at a process weight rate of 1900 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 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.2.2 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 and its control device.

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

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

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the baghouses for PM control shall be in operation at all times when the woodworking shop is in operation.

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking shop stacks 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.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking shop, at least once weekly when the woodworking shop is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stacks exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure.
  - (2) Documentation of all response steps implemented, per event.

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.