



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Michael R. Terlep
Consolidated Leisure Industries, LLC
423 N. Main Street
Middlebury, Indiana 46540

Re: **039-16238**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 039-10599-00192**

Dear Mr. Terlep:

Consolidated Leisure Industries, LLC was issued Part 70 Operating Permit **T 039-10599-00192** on November 12, 1999 for a motor home custom coating source. An application to modify the source was received on October 17, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (b) One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval 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.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval 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.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Consolidated Leisure Industries, LLC
21888 Beck Drive
Elkhart, Indiana 46540**

(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.

First Significant Source Modification 039-16238	Sections Affected: A.2, D.4, Quarterly Report Forms
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 3, 2003

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 a motor home custom coating source.

Responsible Official: Kevin Gipson
Source Address: 21888 Beck Drive, Elkhart, Indiana 46540
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Phone Number: 219-825-8493
SIC Code: 3089 & 3716
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
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) paint room, known as Plant #840, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.
- (b) One (1) plastic forming area, known as Plant #830, exhausted to general ventilation, capacity: 100 plastic sheets per hour.
- (c) One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (d) One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.

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):

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

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);
- (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.4

FACILITY OPERATION CONDITIONS

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

- (c) One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (d) One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.

(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.4.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the two (2) spray booths (DPB-1 and DPB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

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

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total amount of VOC delivered to the applicators at each of the two (2) spray booths (DPB-1 and DPB-2) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) do not apply.
- (b) Any change or modification which would increase the potential to emit VOC from either of the two (2) spray booths (DPB-1 and DPB-2) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

D.4.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) The total amount of any single HAP and combination of all HAPs delivered to the applicators at each of the two (2) spray booths (DPB-1 and DPB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.
- (b) Any change or modification which would increase the potential to emit from either of the two (2) spray booths (DPB-1 and DPB-2) of any single HAP to ten (10) tons per year or more, or a combination of HAPs to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

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 the two (2) spray booths (DPB-1 and DPB-2) and their associated control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, 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.4.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) spray booths (DPB-1 and DPB-2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

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 stacks (S7, S8, S9 and S10) 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 [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.2 and D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAPs usage limits established in Conditions D.4.2 and D.4.3.
 - (1) The VOC and HAPs content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC and HAPs usage for each month; and

- (4) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.4.6 and D.4.7, 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.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.2 and D.4.3 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-1)
Parameter: Total VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Tons of VOC	Tons of VOC	Tons of VOC
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-2)
Parameter: Total VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Tons of VOC	Tons of VOC	Tons of VOC
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
 Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
 Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
 Part 70 Permit No.: T 039-10599-00192
 Facility: Spray booth (DPB-1)
 Parameter: HAPs delivered to the applicators
 Limit: Less than ten (10) tons of the worst case single HAP, and less than twenty-five (25) tons of total HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Worst case single HAP (tons)	Worst case single HAP (tons)	Worst case single HAP (tons)	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
 Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
 Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
 Part 70 Permit No.: T 039-10599-00192
 Facility: Spray booth (DPB-2)
 Parameter: HAPs delivered to the applicators
 Limit: Less than ten (10) tons of the worst case single HAP, and less than twenty-five (25) tons of total HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Worst case single HAP (tons)	Worst case single HAP (tons)	Worst case single HAP (tons)	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Significant Source and Significant Permit Modifications

Source Background and Description

Source Name:	Consolidated Leisure Industries, LLC
Source Location:	21888 Beck Drive, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	7532
Operation Permit No.:	T 039-10599-00192
Operation Permit Issuance Date:	November 12, 1999
Significant Source Modification No.:	039-16238-00192
Significant Permit Modification No.:	039-16741-00192
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a modification application from Consolidated Leisure Industries, LLC relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (b) One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.

History

On October 17, 2002, Consolidated Leisure Industries, LLC submitted an application to the OAQ requesting to add two (2) additional spray lines to their existing plant. Consolidated Leisure Industries, LLC was issued a Part 70 permit on November 12, 1999. At the time of issuance, the source was known as Coachmen Industries, Inc. Since that time, the source also operated under the name Prodesign Paint, until September 27, 2002 when the plant became known as Consolidated Leisure Industries, LLC.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S7	DPB-1	24	3.3	20,000	80
S8	DPB-1	24	3.3	20,000	80

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S9	DPB-2	24	3.3	20,000	80
S10	DPB-2	24	3.3	20,000	80

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information 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 17, 2002. Additional information was received via telephone on November 12, 2002.

Emission Calculations

See pages 1 through 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	13.3
PM ₁₀	13.3
SO ₂	0.00
VOC	115
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Toluene	39.5
Xylene	21.0

HAPs	Potential To Emit (tons/year)
MIBK	7.47
MEK	7.47
Ethylbenzene	3.95
Glycol Ethers	2.13
Methyl Methacrylate	1.32
O-Cresol	1.32
Cumene	1.32
Hexamethylene Diisocyanate	1.07
TOTAL	86.6

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4), since the potential to emit VOC is greater than twenty-five (25) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-16741-00192) accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (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, maintenance attainment or unclassifiable for all remaining criteria pollutants. 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 or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	3.58
PM ₁₀	3.58
SO ₂	2.00
VOC	120
CO	1.00
NO _x	2.00

- (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 one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for T 039-10599-00192.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	13.3	13.3	-	Less than 50	-	-	
PSD 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 threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant modification does not involve a pollutant-specific emissions unit with the potential to emit before control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of hazardous air pollutant (HAP) emissions (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source is constructing one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002. This rule requires the Permittee to:
 - (1) Submit a Part 1 MACT Application within thirty (30) days of startup of the new emission units; and
 - (2) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.

- (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
 - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
 - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

- (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

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

326 IAC 2-4.1 (New source toxics control)

Pursuant to 326 IAC 2-4.1(a), any owner or operator who constructs a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 63.41, after July 27, 1997, is subject to the requirements of 326 IAC 2-4.1 (New source toxics control). Pursuant to 40 CFR 63.41, "construct a major source" means to fabricate, erect or install at any developed site a new process or production unit which in and of itself emits or has the potential to emit ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs.

Each spray booth has the capability to produce a finished product. Therefore, pursuant to 40 CFR 63.41, each booth is considered a production unit. Since this modification consists of the installation of two independent production units at a developed site, the HAPs emissions from each of the two (2) spray booths will be limited to less than ten (10) tons per year of any single HAP, and less than twenty-five (25) tons per year of total HAPs. Therefore, this modification is not a construction of a major source pursuant to 40 CFR 63.41, and thus the requirements of 326 IAC 2-4.1 are not applicable to the proposed spray booths.

Any change or modification which would increase the potential to emit from either of the two (2) spray booths (DPB-1 and DPB-2) of any single HAP to ten (10) tons per year or more, or a combination of HAPs to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The VOC emissions from the two (2) spray booths (DPB-1 and DPB-2) are limited to less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to the proposed spray booths.

Any change or modification which would increase the potential to emit VOC from either of the two (2) spray booths (DPB-1 and DPB-2) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the

condition is modified in a subsequent permit action.

Pursuant to 326 IAC 6-3 and 40 CFR 52 Subpart P the particulate matter (PM) from the two (2) spray booths (DPB-1 and DPB-2) shall be limited by the following:

Interpolation 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:

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

Under the rule revision, particulate from the two (2) spray booths (DPB-1 and DPB-2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

The two (2) spray booths (DPB-1 and DPB-2) have applicable compliance monitoring conditions as specified below:

- (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 stacks (S7, S8, S9 and S10) 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 Response Plan - Preparation, Implementation, Records, and Reports, 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the two (2) spray booths (DPB-1 and DPB-2) must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7 (Part 70).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

On January 1, 2001, the IDEM Office of Air Management changed to the Office of Air Quality. Therefore, all references to Office of Air Management or OAM have been changed to **Office of Air Quality** or **OAQ**.

SECTION A

SOURCE SUMMARY

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) paint room, known as Plant #840, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.
- (b) One (1) plastic forming area, known as Plant #830, exhausted to general ventilation, capacity: 100 plastic sheets per hour.
- (c) **One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.**
- (d) **One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.**

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (c) **One (1) spray booth, identified as DPB-1, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.**
- (d) **One (1) spray booth, identified as DPB-2, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.**

(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.4.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the two (2) spray booths (DPB-1 and DPB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

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

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total amount of VOC delivered to the applicators at each of the two (2) spray booths (DPB-1 and DPB-2) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) do not apply.
- (b) Any change or modification which would increase the potential to emit VOC from either of the two (2) spray booths (DPB-1 and DPB-2) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

D.4.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) The total amount of any single HAP and combination of all HAPs delivered to the applicators at each of the two (2) spray booths (DPB-1 and DPB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.
- (b) Any change or modification which would increase the potential to emit from either of the two (2) spray booths (DPB-1 and DPB-2) of any single HAP to ten (10) tons per year or more, or a combination of HAPs to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

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 the two (2) spray booths (DPB-1 and DPB-2) and their associated control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, 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.4.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) spray booths (DPB-1 and DPB-2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

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 stacks (S7, S8, S9 and S10) 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 [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.2 and D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAPs usage limits established in Conditions D.4.2 and D.4.3.
 - (1) The VOC and HAPs content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC and HAPs usage for each month; and
 - (4) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.4.6 and D.4.7, 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.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.2 and D.4.3 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-1)
Parameter: Total VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Tons of VOC	Tons of VOC	Tons of VOC
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-2)
Parameter: Total VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Tons of VOC	Tons of VOC	Tons of VOC
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-1)
Parameter: HAPs delivered to the applicators
Limit: Less than ten (10) tons of the worst case single HAP, and less than twenty-five (25) tons of total HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Worst case single HAP (tons)	Worst case single HAP (tons)	Worst case single HAP (tons)	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facility: Spray booth (DPB-2)
Parameter: HAPs delivered to the applicators
Limit: Less than ten (10) tons of the worst case single HAP, and less than twenty-five (25) tons of total HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Worst case single HAP (tons)	Worst case single HAP (tons)	Worst case single HAP (tons)	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. **039-16238-00192** and the attached proposed Part 70 Significant Permit Modification No. **039-16741-00192**.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Consolidated Leisure Industries, LLC
Address City IN Zip: 21888 Beck Drive, Elkhart, Indiana 46516
SSM: 039-16238
Plt ID: 039-00192
Reviewer: Edward A. Longenberger
Date: October 17, 2002**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
DPB-1																
CS 160 RTS Flexseal	9.33	50.90%	0.0%	50.9%	0.0%	49.10%	0.75000	0.250	4.75	4.75	0.89	21.37	3.90	0.94	9.67	75%
CL-639 RTS Glamour Clear	8.12	50.10%	0.0%	50.1%	0.0%	49.90%	6.00000	0.250	4.07	4.07	6.10	146.45	26.73	6.66	8.15	75%
5-U7-Mix-RTS Basecoat	7.51	87.70%	0.0%	87.7%	0.0%	12.30%	8.00000	0.250	6.59	6.59	13.17	316.14	57.70	2.02	53.55	75%
Pure Lacquer Thinner	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	2.00000	0.250	7.00	7.00	3.50	84.00	15.33	0.00	N/A	75%
4-399 Pre Cleaner	6.33	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	0.250	6.33	6.33	0.79	18.99	3.47	0.00	N/A	75%
DPB-2																
CS 160 RTS Flexseal	9.33	50.90%	0.0%	50.9%	0.0%	49.10%	0.75000	0.250	4.75	4.75	0.89	21.37	3.90	0.94	9.67	75%
CL-639 RTS Glamour Clear	8.12	50.10%	0.0%	50.1%	0.0%	49.90%	6.00000	0.250	4.07	4.07	6.10	146.45	26.73	6.66	8.15	75%
5-U7-Mix-RTS Basecoat	7.51	87.70%	0.0%	87.7%	0.0%	12.30%	8.00000	0.250	6.59	6.59	13.17	316.14	57.70	2.02	53.55	75%
Pure Lacquer Thinner	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	2.00000	0.250	7.00	7.00	3.50	84.00	15.33	0.00	N/A	75%
4-399 Pre Cleaner	6.33	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	0.250	6.33	6.33	0.79	18.99	3.47	0.00	N/A	75%

Potential to Emit	Add worst case coating to all solvents	PM	Control Efficiency	85.00%												
			Uncontrolled		26.3	632	115	13.3								
			Controlled		26.3	632	115	2.00								

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Consolidated Leisure Industries, LLC
Address City IN Zip: 21888 Beck Drive, Elkhart, Indiana 46516
SSM: 039-16238
Pit ID: 039-00192
Reviewer: Edward A. Longenberger
Date: October 17, 2002

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % MEK	Weight % Methyl Methacrylate	Weight % Glycol Ethers	Weight % O-Cresol	Weight % Ethylbenzene	Weight % Hexamethylene Diisocyanate	Weight % Cumene	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	MEK Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	O-Cresol Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Hexamethylene Diisocyanate Emissions (tons/yr)	Cumene Emissions (tons/yr)
DPB-1																							
CS 160 RTS Flexseal	9.33	0.75000	0.250	5.00%	7.00%	1.00%	1.00%	0.00%	1.00%	0.00%	1.00%	1.00%	1.00%	0.38	0.54	0.08	0.08	0.00	0.08	0.00	0.08	0.08	0.08
CL-639 RTS Glamour Clear	8.12	6.00000	0.250	1.00%	0.00%	7.00%	7.00%	0.00%	2.00%	0.00%	1.00%	1.00%	1.00%	0.53	0.00	3.73	3.73	0.00	1.07	0.00	0.53	0.53	0.53
5-U7-Mix-RTS Basecoat	7.51	8.00000	0.250	16.00%	30.00%	0.00%	0.00%	1.00%	1.00%	1.00%	3.00%	0.00%	1.00%	10.53	19.74	0.00	0.00	0.66	0.66	0.66	1.97	0.00	0.66
Pure Lacquer Thinner	7.00	2.00000	0.250	0.00%	60.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	9.20	1.53	1.53	0.00	0.00	0.00	0.00	0.00	0.00
4-399 Pre Cleaner	6.33	0.50000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DPB-2																							
CS 160 RTS Flexseal	9.33	0.75000	0.250	5.00%	7.00%	1.00%	1.00%	0.00%	1.00%	0.00%	1.00%	1.00%	1.00%	0.38	0.54	0.08	0.08	0.00	0.08	0.00	0.08	0.08	0.08
CL-639 RTS Glamour Clear	8.12	6.00000	0.250	1.00%	0.00%	7.00%	7.00%	0.00%	2.00%	0.00%	1.00%	1.00%	1.00%	0.53	0.00	3.73	3.73	0.00	1.07	0.00	0.53	0.53	0.53
5-U7-Mix-RTS Basecoat	7.51	8.00000	0.250	16.00%	30.00%	0.00%	0.00%	1.00%	1.00%	1.00%	3.00%	0.00%	1.00%	10.53	19.74	0.00	0.00	0.66	0.66	0.66	1.97	0.00	0.66
Pure Lacquer Thinner	7.00	2.00000	0.250	0.00%	60.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	9.20	1.53	1.53	0.00	0.00	0.00	0.00	0.00	0.00
4-399 Pre Cleaner	6.33	0.50000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Individual Total														21.1	39.5	7.47	7.47	1.32	2.13	1.32	3.95	1.07	1.32
Overall Total														86.6									

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs