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

February 25, 2003

Mr. Gary Robinson
Altec Engineering, LLC
28274 CR 20 West
Elkhart, IN 46517

Re: **039-16540**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 039-12828-00519**

Dear Mr. Robinson:

Altec Engineering, LLC was issued Part 70 Operating Permit **T 039-12828-00519** on May 8, 2001, for a stationary fiberglass component manufacturing plant. An application to modify the source was received on December 4, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

The following insignificant activities, with no specifically applicable requirements:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) Four (4) air makeup units, identified as AMU-1 through AMU-4, capacity: 1.5 million British thermal units per hour, each;

(2) One (1) tube heater, identified as T-1, capacity: 0.5 million British thermal unit per hour;

(3) One (1) air circulator, identified as AC-1, capacity: 0.5 million British thermal unit per hour; and

(4) Three (3) unit heaters, identified as U-1, U-3 and U-3, capacity: 0.16 million British thermal units per hour, each.

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 CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 18, 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 (Changed permit pages and Technical Support Document)
CAP/MES
cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
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

Altec Engineering, LLC
2950 Gateway Drive
Elkhart, Indiana 46515

(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.: T039-12828-00519	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality *Original signed by Janet McCabe*	Issuance Date: May 8, 2001 Expiration Date: May 8, 2006

First Significant Source Modification No.: 039-16540-00519	Conditions Affected: A.1, A.2, C.20 is added, Section D.2 is added, and report forms
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: **February 25, 2003**

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Parts 1 and 2 MACT Applications Submittal Requirements
C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56 (a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

D.1 FACILITY OPERATION CONDITIONS - Gel-1, BK-1, and C-1

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.2 New Source Toxics [326 IAC 2-1-3.4]
D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
D.1.6 VOC
D.1.7 VOC
D.1.8 PM

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.10 Record Keeping Requirements
D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Surface coating facility

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]
D.2.3 Particulate [326 IAC 6-3-2]
D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.2.6 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.2.7 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.8 Record Keeping Requirements
D.2.9 Reporting Requirements

Certification
Emergency Occurrence Report
Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass component manufacturing plant.

Responsible Official:	Gary Robinson
Source Address:	2950 Gateway Drive, Elkhart, Indiana 46515
Mailing Address:	28274 CR 20 West, Elkhart, IN 46517
SIC Code:	3070
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; 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) fiberglass coating operation consisting of:

(1) two (2) gel booths, identified as Gel-1 and BK-1, constructed September 22, 1999, with a maximum capacity of 173 pounds of gelcoat per hour, using dry filters as control, and exhausting to stacks Gel-1 and BK-1, (Booth BK-1 may be used as a backup chop coat booth),

(2) one (1) chop booth, identified as C-1, constructed September 22, 1999, with a maximum capacity of 500 pounds of resin per hour, using dry filters as control, and exhausting to stack C-1.

(b) One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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).

motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Parts 1 and 2 MACT Applications Submittal Requirements

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56 (a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 1 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(b)(2) within thirty (30) days of issuance of the Title V permit modification incorporating the requirements of this source modification into the Permittee's Title V operating permit. The Part 1 MACT Application shall meet the requirements of 40 CFR 63.53(a).

(b) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(c) Notwithstanding paragraph (b), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(d) Notwithstanding paragraph (b), 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 initial notification shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

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

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for this facility has been determined to be as follows:

(a) All coatings, except coatings for repair only, shall be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) To achieve the necessary atomization and blend needed for the repair, repair coatings may be applied using air atomized spray applicators, hand applicators (such as brushes), or spray applicators as efficient or more efficient than air atomization spray applicators.

(c) The total VOC usage in coatings, thinners, additives, and cleanup solvents used at the surface coating facilities shall be limited to no more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC to 50.0 tons per twelve (12) consecutive month period.

(d) The volume-weighted average VOC content, less water, of coatings (except repair coatings) used shall be limited as follows, based on a twelve (12) consecutive month period, with compliance determined at the end of each month:

(1) primer: 4.0 pounds VOC per gallon of coating, less water

(2) base coat: 6.70 pounds VOC per gallon of coating, less water

(3) clear coat: 4.2 pounds VOC per gallon of coating, less water

This limit shall include coatings, thinners and additives, but shall not include cleanup solvents.

(e) The listed work practices as follows:

(1) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1, the HAP usage at the surface coating facility shall be limited to no more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials.

D.2.3 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the coating areas, identified as Spray Area 1 and Spray Area 2, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

(b) Any change in the coatings or methods of operation that results in particulate emissions from the prep area may cause the prep area to become subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes, and shall require prior IDEM, OAQ, approval.

(c) Pursuant to 326 IAC 6-3-2(d)(4), any change or modification at the repair area that increases the coating usage to five (5) gallons per day or more shall cause the repair area to become subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes, and shall require prior IDEM, OAQ, approval.

D.2.4 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 and any control devices.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content limits in Condition D.2.1(d) shall be determined by the following equation for each type of coating used (primer, base coat and clear coat) at the end of each month, based on the twelve (12) consecutive month period ending that month:

$$\text{Volume-weighted average VOC content} = \frac{\text{Weight of VOC used from coatings, thinners and additives (lbs)}}{\text{Total volume of coating used (gallons), less water}}$$

D.2.6 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance with the HAP usage limits in Condition D.2.2 shall be determined by the following equation at the end of each month based on the twelve (12) consecutive month period ending that month:

$$\text{HAP usage} = \frac{\text{Weight of organic HAP used from all coatings, thinners, additives and cleanup materials (lbs)}}{\text{Total weight of coating solids used (lbs)}}$$

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

D.2.7 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 stacks (S-1, S-2, S-3 and S-4) while one or more of the areas exhausting to that stack 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.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(c) and (d), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.2.1(c) and (d).

(1) The VOC content of each coating material (including coatings, thinners and additives) and solvent used.

(2) The gallons of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, supplier purchase summaries, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each consecutive twelve (12) month period for each type of coating (primer, base coat or clear coat). During a twelve (12) month period when each coating used of a specific type has a VOC content less than the limit stated in Condition D.2.1(d), the maximum VOC content may be recorded in place of the calculated actual volume weighted VOC content, for that type of coating.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.2.2.

(1) The HAP content of each coating material (including coatings, additives and thinners) and solvent used.

(2) The solids content of each coating used.

(3) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(4) The total amount of HAPs used each month.

(5) The total solids usage each month.

(6) The HAP usage in pounds of HAPs per pound of coating solids for each compliance period.

(c) To document compliance with Conditions D.2.3 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 (c) and (d) and D.2.2 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. 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 OPERATING PERMIT CERTIFICATION

Source Name: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Part 70 Quarterly Report

Source Name: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519
Facility: Gel-1, BK-1, C-1
Parameter: VOC/HAP emissions
Limit: 100 tons per 12 consecutive month period

Usage of each gel coat and resin multiplied by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins.

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: _____

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: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519
Facility: Surface coating facility
Parameter: VOC usage
Limit: No more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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: _____

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: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519
Facility: Surface coating facility
Parameter: Volume-weighted VOC content, less water, per twelve (12) consecutive month period, with compliance determined at the end of each month
Limit: primer: 4.0 lbs VOC/ gallon of coating, base coat: 6.70 lbs VOC/ gallon of coating, clear coat: 4.2 lbs VOC/ gallon of coating, based on the following equation:

$$\text{Volume-weighted average VOC content} = \frac{\text{Weight of VOC used from coatings, thinners and additives (lbs)}}{\text{Total volume of coating used (gallons), less water}}$$

YEAR: _____

Month	Volume-weighted VOC content of primer (lbs VOC/gal coating)	Volume-weighted VOC content of base coat (lbs VOC/gal coating)	Volume-weighted VOC content of clear coat (lbs VOC/gal coating)
	12 Month Period	12 Month Period	12 Month Period

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: _____

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: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519
Facility: Surface coating facility
Parameter: HAP usage
Limit: No more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month, based on the following equation:

$$\text{HAP usage} = \frac{\text{Weight of organic HAP used from all coatings, thinners, additives and cleanup materials (lbs)}}{\text{Total weight of coating solids used (lbs)}}$$

YEAR: _____

Month	Organic HAP Usage (lbs)	Coating Solids Usage (lbs)	HAP Usage (lbs HAP/lb solids)
	12 Month Period	12 Month Period	12 Month Period

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: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit

Source Name:	**Altec Engineering, LLC**
Source Location:	**2950 Gateway Drive, Elkhart, Indiana 46515**
County:	**Elkhart**
Operation Permit No.:	**T 039-12828-00519**
Significant Source Modification No.:	**039-16540-00519**
Significant Permit Modification No.:	**039-16983-00519**
SIC Code:	**3089**
Permit Reviewer:	**CarrieAnn Paukowits**

On January 22, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Altec Engineering, LLC had applied for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit to construct and operate one (1) motor home and travel trailer surface coating facility with dry filters as controls, at the existing source. The notice also stated that OAQ proposed to issue Significant Source and Significant Permit Modifications and provided information on how the public could review the proposed Significant Source and Significant Permit Modifications and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not these Significant Source and Significant Permit Modifications to a Part 70 Operating Permit should be issued as proposed.

On February 6, 2003, Jon L'Hommedieu of Altec Engineering, LLC, submitted comments on the proposed Significant Source and Permit Modifications to a Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.)**:

Comment 1:

Revise Condition D.2.8(a)(1)(A) to "Records shall include purchase orders, supplier purchase summaries, invoices..." This simplifies the process greatly for us. The supplier does a summary of what has been supplied with a complete breakdown and all calculations.

Response 1:

Condition D.2.8(a)(1)(A) is revised as follows:

(A) Records shall include purchase orders, **supplier purchase summaries,** invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

Comment 2:

Revise Condition D.2.8(a)(3) to "The volume weighted VOC content of the coatings used for each consecutive twelve (12) month period of each type of coating (primer, base coat or clear coat), unless all of the coatings in a type is compliant."

Response 2:

During any twelve month period when one or more coating with a VOC content greater than the limits stated in Condition D.2.1(d) is used, the volume weighted VOC content of the coatings must be calculated and supplied to show that the source is in compliance with the limits. However, if only coatings with VOC contents less than the limits are used, a record of the maximum content and supporting documentation is acceptable. Therefore, Condition D.2.8(a)(3) is revised as follows:

(3) The volume weighted VOC content of the coatings used for each consecutive twelve (12) month period for each type of coating (primer, base coat or clear coat). **During a twelve (12) month period when each coating used of a specific type has a VOC content less than the limit stated in Condition D.2.1(d), the maximum VOC content may be recorded in place of the calculated actual volume weighted VOC content, for that type of coating.**

Upon further review, the OAQ has decided to make the following changes to the Significant Permit Modification to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

In order to clarify when air atomization can be used to apply materials, and to clarify that application methods other than air atomization may be used for repair coatings, Condition D.2.1(b) is revised as follows:

(b) ~~Coatings for repair only shall be applied using air atomized spray applicators~~ To achieve the necessary atomization and blend needed for the repair**, repair coatings may be applied using air atomized spray applicators, hand applicators (such as brushes), or spray applicators as efficient or more efficient than air atomization spray applicators.**

Change 2:

In order to clarify that the VOC emission limit in Condition D.2.1(c) applies to thinners and additives, as well as coatings and cleanup solvents, that condition is revised as follows:

(c) The total VOC usage in coatings**, thinners, additives,** and cleanup solvents used at the surface coating facilities shall be limited to no more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. **This will limit the potential to emit VOC to 50.0 tons per twelve (12) consecutive month period.**

Change 3:

Repair coatings often have to be formulated for specific repair operations. Therefore, the limits in Condition D.2.1(d) do not apply to repair coatings. Condition D.2.1(d) has also been revised to specify that cleanup solvents are not included in the VOC content limits for the coatings, and the equation in Condition D.2.5 and on the Quarterly Report Form has been revised accordingly. Conditions D.2.1(d) and D.2.5 have been revised as follows:

(d) The volume-weighted average VOC content, less water, of coatings **(except repair**

coatings) used shall be limited as follows, based on a twelve (12) consecutive month period, with compliance determined at the end of each month:

(1) primer: 4.0 pounds VOC per gallon of coating, less water

(2) base coat: 6.70 pounds VOC per gallon of coating, less water

(3) clear coat: 4.2 pounds VOC per gallon of coating, less water

This limit shall include coatings, thinners and additives, but shall not include cleanup solvents.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content limits in Condition D.2.1(d) shall be determined by the following equation for each type of coating used (primer, base coat and clear coat) at the end of each month, based on the twelve (12) consecutive month period ending that month:

Volume-weighted average VOC content = Weight of VOC used **from coatings, thinners and additives** ~~for the twelve month period~~ (lbs)
Total volume of coating used (gallons), less water

Change 4:

The formula in Condition D.2.6 and on the Quarterly Report Form has been revised to specify all of the materials included in the HAP limit, as follows:

D.2.6 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance with the HAP usage limits in Condition D.2.2 shall be determined by the following equation at the end of each month based on the twelve (12) consecutive month period ending that month:

HAP usage = Weight of organic HAP used **from all coatings, thinners, additives and cleanup materials** (lbs)
Total weight of coating solids used (lbs)

Change 5:

Condition D.2.8 has been revised to specify more clearly the records needed to show compliance with Conditions D.2.1 and D.2.2, as follows:

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(c) and (d), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.2.1(c) and (d).

(1) The VOC content of each coating material **(including coatings, thinners and additives)** and solvent used.

(2) The ~~amount~~ **gallons** of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, supplier purchase summaries, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each consecutive twelve (12) month period for each type of coating (primer, base coat or clear coat). During a twelve (12) month period when each coating used of a specific type has a VOC content less than the limit stated in Condition D.2.1(d), the maximum VOC content may be recorded in place of the calculated actual volume weighted VOC content, for that type of coating.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through ~~(4)~~ **(6)** below. Records maintained for (1) through ~~(4)~~ **(6)** shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.2.2.

(1) The HAP content of each coating material **(including coatings, additives and thinners)** and solvent used.

(2) The solids content of each coating ~~material and solvent~~ used.

(3) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(4) The total amount of HAPs used each month.

(5) The total solids usage each month.

~~(4)~~**(6)** The HAP usage in pounds of HAPs per pound of coating solids for each compliance period.

(c) To document compliance with Conditions D.2.3 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Altec Engineering, LLC**
Source Location:	**2950 Gateway Drive, Elkhart, Indiana 46515**
County:	**Elkhart**
SIC Code:	**3089**
Operation Permit No.:	**T 039-12828-00519**
Operation Permit Issuance Date:	**May 8, 2001**
Significant Source Modification No.:	**039-16540-00519**
Significant Permit Modification No.:	**039-16983-00519**
Permit Reviewer:	**CarrieAnn Paukowits**

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

One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

This modification also consists of the following insignificant activities, with no specifically applicable requirements:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) Four (4) air makeup units, identified as AMU-1 through AMU-4, capacity: 1.5 million British thermal units per hour, each;

(2) One (1) tube heater, identified as T-1, capacity: 0.5 million British thermal unit per hour;

(3) One (1) air circulator, identified as AC-1, capacity: 0.5 million British thermal unit per hour; and

(4) Three (3) unit heaters, identified as U-1, U-3 and U-3, capacity: 0.16 million British thermal units per hour, each.

History

On December 4, 2002, Altec Engineering, LLC submitted an application to the OAQ requesting to add a motor home and travel trailer surface coating facility to their existing plant. Altec Engineering, LLC was issued a Part 70 permit on May 8, 2001.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S-1	Spray Area 1	33.0	3.5	23,800	Ambient
S-2	Spray Area 1	33.0	3.5	23,800	Ambient
S-3	Spray Area 2	33.0	3.5	23,800	Ambient
S-4	Spray Area 2	33.0	3.5	23,800	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Permit Modifications 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 December 4, 2002. Additional information was received on December 20, 2002, and January 8, 9 and 10, 2003.

Emission Calculations

See pages 1 through 4 of 4 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	19.7
PM_{10}	19.9
SO_2	0.020
VOC	144
CO	2.75
NO_X	3.28

HAPs	**Potential To Emit** (tons/year)
Xylene	29.5
Toluene	7.67
MEK	12.3
Ethyl benzene	5.01
MIBK	6.70
Glycol Ethers	7.82
Benzene	0.00007
Dichlorobenzene	0.00004
Formaldehyde	0.002
Hexane	0.059
Lead	0.00002
Cadmium	0.00004
Chromium	0.00005
Manganese	0.00001
Nickel	0.00007
TOTAL	69.0

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)(D), “Any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of volatile organic compounds (VOC),” and 326 IAC 2-7-10.5(f)(6), “Any modification with a potential to emit greater than or equal to ten (10) tons per year of a single hazardous air pollutant as defined under Section 112(b)

of the CAA or twenty-five (25) tons per year of any combination of hazardous air pollutants." The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-16983-00519) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	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 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	4.00
PM_{10}	4.00
SO_2	negligible
VOC	100
CO	negligible
NO_X	negligible

(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 to T039-12828-00519, issued on May 8, 2001, and the 1999 Emission Statement.

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.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification	19.7	19.9	0.020	50.2	2.75	3.28	69.0
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:

(1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and

(2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

(b) The smallest motorized vehicle painted at this source is 14,000 pounds (6,350 kilograms), which is larger than 3,850 kilograms. Therefore, the trailers and motor homes painted at this source are not considered automobiles or light duty trucks, and the requirements of 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, are not applicable.

(c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) 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 constructing new emissions units at an existing 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 new units 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 issuance of the Title V permit modification incorporating the requirements of this source modification into the Permittee's Title V operating permit; 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))

The potential to emit VOC from the existing emissions units are limited to less than 100 tons per year. The potential to emit VOC from the new proposed emissions units is 50.2 tons per year, including combustion. Therefore, the potential to emit VOC is less than 250 tons per year. The unrestricted potential to emit all other criteria pollutants from this source is also less than 250 tons per year. Therefore, this source is still not a major source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit an individual HAP from the new proposed facility is greater than 10 tons per year and the potential to emit any combination of HAPs is greater than 25 tons per year. Therefore, the source is subject to the requirements of 326 IAC 2-4.1-1.

The facility will coat reinforced plastic motor homes and travel trailers. The applicant has agreed to limit HAP emissions so that they would comply with the Maximum Achievable Control Technology requirements of the proposed NESHAP for surface coating of plastic parts and products, 40 CFR 63, Subpart PPPP, published in the federal register, Vol. 67, No. 233, on December 4, 2002. The applicant will use Option 2. Pursuant to the proposed 40 CFR 63.4481(a)(5), the motor homes and travel trailers are intended for on-road use and are, therefore, considered on-road vehicles. Therefore, the HAP usage shall be limited to no more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials. In order to comply with this limit, the Permittee must keep track of the mass of organic HAP in each coating, thinner, additive, or cleaning material used and the total mass of all coating solids used during each month. The mass of organic HAP for the most recent twelve (12) month period divided by the mass of coating solids for the same twelve (12) month period must be less than 1.34, as determined each month.

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

(a) The prep area does not have the potential to emit PM. Therefore, the prep area is not subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.

(b) Pursuant to 326 IAC 6-3-2(d), particulate from the coating areas, identified as Spray Area 1 and Spray Area 2, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(c) The repair area uses less than five (5) gallons per day of coatings. Therefore, pursuant to 326 IAC 6-3-1(b)(15), the repair area is exempt from the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.

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

The potential VOC emissions from the proposed facility are greater than 25 tons per year. Since there are no other 326 IAC 8 rules applicable to coating plastic parts, the requirements of 326 IAC 8-1-6 are applicable, and the source must install the best available control technology (BACT).

The following control options were evaluated in a BACT analysis:

(a) Condensation- Condensation systems are only effective for gas streams containing high concentrations of high molecular weight VOCs. The exhaust streams at this source contain low concentrations of relatively low molecular weight VOCs. Therefore, condensation is not technically feasible.

(b) Chemical Scrubbers - In order for liquid absorption to be effective, the VOCs must be soluble in the same liquid. At this source, coatings often contain VOCs which are not soluble in the same liquid. Therefore, chemical scrubbers are not technically feasible.

(c) Carbon Adsorption- The condensate from the waste streams would contain several chemicals, and it is not practicable to recover the solvents for reuse. Therefore, the only technologically feasible control option using carbon adsorption is destroy the VOC with a thermal oxidizer after carbon adsorption (see Concentrator Treatment Systems below).

(d) Incineration:

(1) Thermal Incinerator - Thermal incineration is technically feasible at this source.

(2) Catalytic Incineration - Catalytic incineration is technically feasible at this source.

(3) Concentrator Treatment Systems - Concentrator systems combine the features of adsorption and incineration. This involves adsorbing the VOCs from a large volume air stream onto a bed of activated carbon, then desorbing the VOCs from the bed with a small volume of hot air. The smaller concentrated air stream is then incinerated. Carbon and Zeolite concentrator treatment systems are technically feasible at this source.

(e) Thermal Oxidation - A regenerative thermal oxidizer is a technically feasible control option for this source.

(g) Biofiltration - Biofiltration is a land-intensive systems in which contaminated air is fed under an active bed of soil containing microorganisms. As air rises through the soil, the microorganisms consume and convert the chemicals into carbon dioxide and water. This source does not have sufficient available land to use for the filter bed. Therefore, biofiltration is not technically feasible.

Additional control methods considered by the source are as follows:

(a) Transfer Efficiency - High volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficiency than HVLP will be used to apply all coatings, except repair coatings, at this facility.

(b) High solids coating systems - The facility will use some materials that may be considered high-solids content coatings. Coatings with higher solvent contents would require a drying oven operating at temperatures above 195 degrees Fahrenheit to obtain the finish quality and production rate required. This is not technically feasible because the assembled motor homes and travel trailers include some heat sensitive materials, such as tires, rubber tubing, and plastic parts. The applicant is proposing to limit the volume-weighted average VOC content of the coating used, less water, based on a twelve (12) consecutive month period, with compliance determined at the end of each month, as follows:

primer: 4.0 lbs VOC/ gallon of coating

base coat: 6.70 lbs VOC/ gallon of coating

clear coat: 4.2 lbs VOC/ gallon of coating

(c) Waterborne coatings - Waterborne coatings are sometimes used to reduce VOC emissions from surface coating. The drying times of waterborne coatings is dependent on temperature and humidity. The drying time is longer than that of solvent based coatings, making waterborne coatings technically infeasible. In addition, a dryer cannot be added to this process because the assembled motor homes and travel trailers include some heat sensitive materials, such as tires, rubber tubing, and plastic parts.

(d) Non-photochemically reactive solvent substitutes **-** Many of the non-photochemically reactive solvents used in paint formulations cause stratospheric ozone depletion. The applicant will explore the use of acetone in initial cleaning of the units to be painted.

The add-on control options evaluated in a cost analysis are carbon adsorption, thermal incineration, catalytic incineration, concentrator treatment systems and regenerative thermal oxidation. The cost of add-on control methods, as determined by the cost analysis, ranged between $3,816.51 per ton of VOC removed and $13,947.41 per ton of VOC removed. The least expensive was adding a concentrator treatment system (carbon adsorption with an oxidizer) ($3,816.51 per ton). The applicant has indicated that these add-on control methods are economically not feasible for this source. The source is predicting a negative profit for the first year of operation and a net loss over the first two years. In a review of BACT for other sources in Indiana, the sources did not use add-on controls to comply with BACT. Also, the proposed MACT for this type of source states that there are no add-on controls used for the assembled on-road vehicle subcategory. The applicant will accept a VOC emission limit of 50 tons per year as part of BACT.

Therefore, BACT for this facility has been determined to be as follows:

(a) All coatings, except coatings for repair only, will be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) Coatings for repair only will be applied using air atomized spray applicators to achieve the necessary atomization and blend needed for the repair.

(c) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The volume-weighted average VOC content, less water, of coatings used shall be limited as follows, based on a twelve (12) consecutive month period, with compliance determined at the end of each month:

(1) primer: 4.0 lbs VOC/ gallon of coating

(2) base coat: 6.70 lbs VOC/ gallon of coating

(3) clear coat: 4.2 lbs VOC/ gallon of coating

In order to comply with this limit, the Permittee must keep track of the mass of VOC used for each type of coating and the total gallons of that type of coating used during each month. For each type of coating (primer, base coat and clear coat), the mass of VOC for the most recent twelve (12) month period divided by the gallons of coating used for the same twelve (12) month period must be less than the above stated limit, as determined each month.

(e) The listed work practices as follows:

(1) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

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 the proposed surface coating facility are as follows:

(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 stacks (S-1, S-2, S-3 and S-4) while one or more of the areas exhausting to that stack 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 paint and clear coat operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) 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**):

The source address has been corrected on the cover page, in Section A.1, and on all forms, as follows:

2950 Gateway Drive, Elkhart, Indiana ~~46514~~ **46515**

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) fiberglass coating operation consisting of:

(1) two (2) gel booths, identified as Gel-1 and BK-1, constructed September 22, 1999, with a maximum capacity of 173 pounds of gelcoat per hour, using dry filters as control, and exhausting to stacks Gel-1 and BK-1, (Booth BK-1 may be used as a backup chop coat booth),

(2) one (1) chop booth, identified as C-1, constructed September 22, 1999, with a maximum capacity of 500 pounds of resin per hour, using dry filters as control, and exhausting to stack C-1.

(b) One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56 (a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 1 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(b)(2) within thirty (30) days of issuance of the Title V permit modification incorporating the requirements of this source modification into the Permittee's Title V operating permit. The Part 1 MACT Application shall meet the requirements of 40 CFR 63.53(a).

(b) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(c) Notwithstanding paragraph (b), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(d) Notwithstanding paragraph (b), 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 initial notification shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) motor home and travel trailer surface coating facility, with a capacity to paint 0.40 full motor homes per hour or an equivalent number of towed units, identified as ACC, consisting of the following:

(1) One (1) prep area for hand wiping parts with a solvent, exhausting into the plant;

(2) One (1) coating area, identified as Spray Area 1, equipped with high volume, low pressure (HVLP) or as spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-1 and S-2;

(3) One (1) coating area, identified as Spray Area 2, equipped with high volume, low pressure (HVLP) spray guns or spray guns at least as efficient, and air atomized spray guns for repairs only, and dry filters for overspray control, exhausting to stacks S-3 and S-4; and

(4) One (1) repair area, equipped with air atomized spray guns, exhausting into the plant, and using less than five (5) gallons of coatings per day.

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

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for this facility has been determined to be as follows:

(a) All coatings, except coatings for repair only, shall be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) Coatings for repair only shall be applied using air atomized spray applicators to achieve the necessary atomization and blend needed for the repair.

(c) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The volume-weighted average VOC content, less water, of coatings used shall be limited as follows, based on a twelve (12) consecutive month period, with compliance determined at the end of each month:

(1) primer: 4.0 pounds VOC per gallon of coating, less water

(2) base coat: 6.70 pounds VOC per gallon of coating, less water

(3) clear coat: 4.2 pounds VOC per gallon of coating, less water

(e) The listed work practices as follows:

(1) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1, the HAP usage at the surface coating facility shall be limited to no more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials.

D.2.3 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the coating areas, identified as Spray Area 1 and Spray Area 2, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

(b) Any change in the coatings or methods of operation that results in particulate emissions from the prep area may cause the prep area to become subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes, and shall require prior IDEM, OAQ, approval.

(c) Pursuant to 326 IAC 6-3-2(d)(4), any change or modification at the repair area that increases the coating usage to five (5) gallons per day or more shall cause the repair area to become subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes, and shall require prior IDEM, OAQ, approval.

D.2.4 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 and any control devices.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content limits in Condition D.2.1(d) shall be determined by the following equation for each type of coating used (primer, base coat and clear coat) at the end of each month, based on the twelve (12) consecutive month period ending that month:

$$\text{Volume-weighted average VOC content} = \frac{\text{Weight of VOC used for the twelve month period (lbs)}}{\text{Volume of coating used (gallons), less water}}$$

D.2.6 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance with the HAP usage limits in Condition D.2.2 shall be determined by the following equation at the end of each month based on the twelve (12) consecutive month period ending that month:

$$\text{HAP usage} = \frac{\text{Weight of organic HAP used (lbs)}}{\text{Weight of coating solids used (lbs)}}$$

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

D.2.7 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 stacks (S-1, S-2, S-3 and S-4) while one or more of the areas exhausting to that stack 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.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(c) and (d), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.2.1(c) and (d).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each consecutive twelve (12) month period for each type of coating (primer, base coat or clear coat).

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.2.2.

(1) The HAP content of each coating material and solvent used.

(2) The solids content of each coating material and solvent used.

(3) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(4) The HAP usage in pounds of HAPs per pound of coating solids for each compliance period.

(c) To document compliance with Conditions D.2.3 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 (c) and (d) and D.2.2 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. 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: **Altec Engineering, LLC**
Source Address: **2950 Gateway Drive, Elkhart, IN 46515**
Mailing Address: **28274 CR 20 West, Elkhart, IN 46517**
Part 70 Permit No.: **T039-12828-00519**
Facility: **Surface coating facility**
Parameter: **VOC usage**
Limit: **No more than 50.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month**

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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: _____

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: Altec Engineering, LLC
Source Address: 2950 Gateway Drive, Elkhart, IN 46515
Mailing Address: 28274 CR 20 West, Elkhart, IN 46517
Part 70 Permit No.: T039-12828-00519
Facility: Surface coating facility
Parameter: Volume-weighted VOC content, less water, per twelve (12) consecutive month period, with compliance determined at the end of each month
Limit: primer: 4.0 lbs VOC/ gallon of coating, base coat: 6.70 lbs VOC/ gallon of coating, clear coat: 4.2 lbs VOC/ gallon of coating, based on the following equation:

Volume-weighted average VOC content = Weight of VOC used for the twelve month period (lbs) / Volume of coating used, less water (gallons)

YEAR: _____

Month	Volume-weighted VOC content of primer (lbs VOC/gal coating)	Volume-weighted VOC content of base coat (lbs VOC/gal coating)	Volume-weighted VOC content of clear coat (lbs VOC/gal coating)
	12 Month Period	12 Month Period	12 Month Period

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: _____

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: **Altec Engineering, LLC**
Source Address: **2950 Gateway Drive, Elkhart, IN 46515**
Mailing Address: **28274 CR 20 West, Elkhart, IN 46517**
Part 70 Permit No.: **T039-12828-00519**
Facility: **Surface coating facility**
Parameter: **HAP usage**
Limit: **No more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month, based on the following equation:**

$$\text{HAP usage} = \frac{\text{Weight of organic HAP used (lbs)}}{\text{Weight of coating solids used (lbs)}}$$

YEAR: _____

Month	Organic HAP Usage (lbs)	Coating Solids Usage (lbs)	HAP Usage (lbs HAP/lb solids)
	12 Month Period	12 Month Period	12 Month Period

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: _____

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-16540-00519, and the operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-16983-00519.

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

Company Name: Altec Engineering, LLC
Address City IN Zip: 2950 Gateway Drive, Elkhart, Indiana 46515
Source Modification: 039-16540
Permit Modification: 039-16983
Plt ID: 039-00519
Reviewer: CarrieAnn Paukowits
Date: December 4, 2002

Material	Density (lbs/gal)	Weight % Volatile (H20 & 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
prep (R7K156)	6.40	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.400	6.40	6.40	2.56	61.44	11.21	0.00	ERR	75%
plastic primer (UPO-7226)	7.35	89.00%	0.0%	89.0%	0.0%	8.80%	0.02000	0.400	6.54	6.54	0.05	1.26	0.23	0.01	74.34	75%
primer (S059 UH-100 V6V299)	10.85	30.80%	0.0%	30.8%	0.0%	53.70%	1.00000	0.400	3.34	3.34	1.34	32.08	5.85	3.29	6.22	75%
base (U7000, 1:1 w/ BCS-605)	7.62	86.60%	0.0%	86.6%	0.0%	8.80%	3.00000	0.400	6.60	6.60	7.92	190.05	34.68	1.34	74.99	75%
colors (U7000, 1:1 w/ BCS-605)	7.62	86.60%	0.0%	86.6%	0.0%	8.80%	3.00000	0.400	6.60	6.60	7.92	190.05	34.68	1.34	74.99	75%
clear (4 CC633:1 US6:1 UH60 RTS)	7.97	51.10%	0.0%	51.1%	0.0%	41.10%	8.00000	0.400	4.07	4.07	13.03	312.78	57.08	13.66	9.91	75%
								PM	Control Efficiency	96.50%					
Potential to Emit			**Add worst case coating to all solvents**						**Uncontrolled**		**32.8**	**788**	**144**	**19.6**		
									Controlled		**32.8**	**788**	**144**	**0.687**		

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) * (1-Transfer efficiency) *(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: Altec Engineering, LLC
Address City IN Zip: 2950 Gateway Drive, Elkhart, Indiana 46515
Source Modification: 039-16540
Permit Modification: 039-16983
Plt ID: 039-00519
Reviewer: CarrieAnn Paukowits
Date: December 4, 2002

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Ethylbenzene	Weight % MIBK	Weight % Glycol Ethers	Xylene Emissions	Toluene Emissions	MEK Emissions	Ethylbenzene Emissions	MIBK Emissions	Glycol Ethers Emissions
										(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
prep (R7K156)	6.40	1.00000	0.400	0.00%	11.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.23	0.00	0.00	0.00	0.00
plastic primer (UPO-7226)	7.35	0.02000	0.400	38.00%	44.00%	0.00%	7.00%	0.00%	0.00%	0.10	0.11	0.00	0.02	0.00	0.00
primer (S059 UH-100 V6V299)	10.85	1.00000	0.400	7.00%	8.00%	0.00%	1.00%	0.00%	0.00%	1.33	1.52	0.00	0.19	0.00	0.00
base (U7000, 1:1 w/ BCS-605)	7.62	3.00000	0.400	35.00%	6.00%	0.00%	6.00%	0.00%	0.00%	14.02	2.40	0.00	2.40	0.00	0.00
colors (U7000, 1:1 w/ BCS-605)	7.62	3.00000	0.400	35.00%	6.00%	0.00%	6.00%	0.00%	0.00%	14.02	2.40	0.00	2.40	0.00	0.00
clear (4 CC633:1 US6:1 UH60 RTS)	7.97	8.00000	0.400	0.00%	0.00%	11.00%	0.00%	6.00%	7.00%	0.00	0.00	12.29	0.00	6.70	7.82
										29.5	**7.67**	**12.3**	**5.01**	**6.70**	**7.82**
														Overall Total	**69.0**

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Altec Engineering, LLC
Address City IN Zip: 2950 Gateway Drive, Elkhart, Indiana 46515
Source Modification: 039-16540
Permit Modification: 039-16983
Plt ID: 039-00519
Reviewer: CarrieAnn Paukowits
Date: December 4, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.48	65.52

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.062	0.249	0.020	3.28	0.180	2.75

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Altec Engineering, LLC
Address City IN Zip: 2950 Gateway Drive, Elkhart, Indiana 46515
Source Modification: 039-16540
Permit Modification: 039-16983
Plt ID: 039-00519
Reviewer: CarrieAnn Paukowits
Date: December 4, 2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.88E-05	3.93E-05	2.46E-03	5.90E-02	1.11E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	1.64E-05	3.60E-05	4.59E-05	1.24E-05	6.88E-05	0.062

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

BACT Cost Analysis

Facility Name: Altec Engineering, LLC

Location: 2950 Gateway Drive, Elkhart, Indiana 46515

Source Modification No.: 039-16540

Permit Modification No.: 039-16983

Permit Reviewer: CarrieAnn Paukowits/ MES

Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Thermal Incinerator	186,867.56	56,060.27	57,928.94	$300,856.77
Catalytic Incinerator	1,194,708.02	358,412.41	370,359.49	$1,923,479.92
Regenerative Thermal Oxidizer	3,320,417.87	996,125.36	1,029,329.54	$5,345,872.77
Carbon Adsorber with Regenerative Thermal Oxidizer	1,882,728.50	564,818.56	583,645.85	$3,031,192.95

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Thermal Incinerator	1,906,830.00	20,290.00	57,736.00	$1,984,856.00
Catalytic Incinerator	832,880.00	88,665.00	282,448.00	$1,203,993.00
Regenerative Thermal Oxidizer	202,735.00	137,635.00	466,619.00	$806,989.00
Carbon Adsorber with Regenerative Thermal Oxidizer	37,229.00	105,507.00	351,044.00	$493,780.00

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton removed
Thermal Incinerator	143.75	142.31	99	$13,947.41
Catalytic Incinerator	143.75	129.38	90	$9,305.87
Regenerative Thermal Oxidizer	143.75	129.38	90	$6,237.35
Carbon Adsorber with Regenerative Thermal Oxidizer	143.75	129.38	90	$3,816.51

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.

c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).

b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 yrs life of the system and 5 yrs life of carbon at 7% interest rate).