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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) TRANSITION OFFICE OF AIR QUALITY

**Damon Corporation Plts. 1, 2, 3, and 9  
52570 Paul and 2929 Gateway Drive  
Elkhart, Indiana 46514**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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 2-8 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.: F039-17521-00407	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 18, 2003  Expiration Date: December 18, 2008

**TABLE OF CONTENTS**

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>7</b>
A.1	General Information [326 IAC 2-8-3(b)]	7
A.2	Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]	7
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	7
A.4	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	8
A.5	FESOP Applicability [326 IAC 2-8-2]	9
A.6	Prior Permits Superseded [326 IAC 2-1.1-9.5]	9
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>11</b>
B.1	Permit No Defense [IC 13]	11
B.2	Definitions [326 IAC 2-8-1]	11
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	11
B.4	Enforceability [326 IAC 2-8-6]	11
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	11
B.6	Severability [326 IAC 2-8-4(4)]	11
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	11
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	11
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	11
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	12
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	12
B.12	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	12
B.13	Emergency Provisions [326 IAC 2-8-12]	13
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	15
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	15
B.16	Permit Renewal [326 IAC 2-8-3(h)]	16
B.17	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	16
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	17
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	18
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	18
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	18
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	19
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS .....</b>	<b>20</b>
	<b>Emissions Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>20</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	20
C.2	Overall Source Limit [326 IAC 2-8]	20
C.3	Opacity [326 IAC 5-1]	20
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	21
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	21
C.6	Fugitive Dust Emissions [326 IAC 6-4]	21
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	21
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	21
	<b>Testing Requirements [326 IAC 2-8-4(3)] .....</b>	<b>22</b>
C.9	Performance Testing [326 IAC 3-6]	22
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>23</b>
C.10	Compliance Requirements [326 IAC 2-1.1-11]	23
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] .....</b>	<b>23</b>
C.11	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	23
C.12	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	23
	<b>Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] .....</b>	<b>23</b>
C.13	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	23
C.14	Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]	23
C.15	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326	

IAC 2-8-5]	25
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....	<b>25</b>
C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]	25
C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	25
C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	26
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1	26
<b>SECTION D.1 FACILITY OPERATION CONDITIONS</b> .....	<b>27</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>27</b>
D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	27
D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	27
D.1.3 PSD Minor Limit [326 IAC 2-2]	27
D.1.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	27
D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]	27
D.1.6 Particulate [326 IAC 6-3-2(d)]	27
D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	27
<b>Compliance Determination Requirements</b> .....	<b>28</b>
D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	28
D.1.9 VOC Emissions [326 IAC 2-2]	28
D.1.10 HAP Emissions [40 CFR Part 63] [326 IAC 20]	28
<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b> .....	<b>28</b>
D.1.11 Monitoring	28
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b> .....	<b>28</b>
D.1.12 Record Keeping Requirements	28
D.1.13 Reporting Requirements	29
<b>SECTION D.2 FACILITY OPERATION CONDITIONS</b> .....	<b>30</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>30</b>
D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	30
D.2.2 PSD Minor Limit [326 IAC 2-2]	30
D.2.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	30
D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]	30
<b>Compliance Determination Requirements</b> .....	<b>30</b>
D.2.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	30
D.2.6 VOC Emissions [326 IAC 2-2]	30
D.2.7 HAP Emissions [40 CFR Part 63] [326 IAC 20] [326 IAC 20]	30
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b> .....	<b>31</b>
D.2.8 Record Keeping Requirements	31
D.2.9 Reporting Requirements	31
<b>SECTION D.3 FACILITY OPERATION CONDITIONS</b> .....	<b>32</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>32</b>
D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	32
D.3.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	32
D.3.3 PSD Minor Limit [326 IAC 2-2]	32
D.3.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	32
<b>Compliance Determination Requirements</b> .....	<b>32</b>
D.3.5 Volatile Organic Compounds (VOC)	32
D.3.6 VOC Emissions [326 IAC 2-2]	32
D.3.7 HAP Emissions [40 CFR Part 63] [326 IAC 20]	32
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b> .....	<b>33</b>
D.3.8 Record Keeping Requirements	33
D.3.9 Reporting Requirements	33
<b>SECTION D.4 FACILITY OPERATION CONDITIONS</b> .....	<b>34</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>34</b>
D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	34
D.4.2 PSD Minor Limit [326 IAC 2-2]	34
D.4.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	34
<b>Compliance Determination Requirements</b> .....	<b>34</b>

D.4.4	Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	34
D.4.5	VOC Emissions [326 IAC 2-2]	34
D.4.6	HAP Emissions [40 CFR Part 63] [326 IAC 20]	34
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>34</b>
D.4.7	Record Keeping Requirements	34
D.4.8	Reporting Requirements	35
<b>SECTION D.5</b>	<b>FACILITY CONDITIONS</b>	<b>36</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>36</b>
D.5.1	Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	36
D.5.2	Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	36
D.5.3	PSD Minor Limit [326 IAC 2-2]	36
D.5.4	Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	36
	<b>Compliance Determination Requirements</b>	<b>36</b>
D.5.5	Volatile Organic Compounds (VOC)	36
D.5.6	VOC Emissions [326 IAC 2-2]	36
D.5.7	HAP Emissions [40 CFR Part 63] [326 IAC 20]	36
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>37</b>
D.5.8	Record Keeping Requirements	37
D.5.9	Reporting Requirements	37
<b>SECTION D.6</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>38</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>38</b>
D.6.1	Volatile Organic Compounds (VOC) [326 IAC 8-2-12]	38
D.6.2	PSD Minor Limit [326 IAC 2-2]	38
D.6.3	Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	38
D.6.4	Particulate Matter (PM) [40 CFR 52 Subpart P]	38
	<b>Compliance Determination Requirements</b>	<b>39</b>
D.6.5	VOC Emissions [326 IAC 2-2]	39
D.6.6	HAP Emissions [40 CFR Part 63] [326 IAC 20]	39
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>39</b>
D.6.7	Record Keeping Requirements	39
D.6.8	Reporting Requirements	39
<b>SECTION D.7</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>40</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>40</b>
D.7.1	Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	40
D.7.2	PSD Minor Limit [326 IAC 2-2]	40
D.7.3	Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	40
D.7.4	Particulate Matter (PM) [40 CFR 52 Subpart P]	40
	<b>Compliance Determination Requirements</b>	<b>40</b>
D.7.5	Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	40
D.7.6	VOC Emissions [326 IAC 2-2]	40
D.7.7	HAP Emissions [40 CFR Part 63] [326 IAC 20]	40
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>41</b>
D.7.8	Record Keeping Requirements	41
D.7.9	Reporting Requirements	41
<b>SECTION D.8</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>42</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>42</b>
D.8.1	Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	42
D.8.2	Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	42
D.8.3	PSD Minor Limit [326 IAC 2-2]	42
D.8.4	Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	42
D.8.5	Particulate Matter (PM) [40 CFR 52 Subpart P]	42
D.8.6	Particulate [326 IAC 6-3-2(d)]	42
D.8.7	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	42
	<b>Compliance Determination Requirements</b>	<b>43</b>
D.8.8	Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	43
D.8.9	VOC Emissions [326 IAC 2-2]	43

D.8.10 HAP Emissions [40 CFR Part 63] [326 IAC 20]	43
<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>	<b>43</b>
D.8.11 Monitoring	43
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>43</b>
D.8.12 Record Keeping Requirements	43
D.8.13 Reporting Requirements	43
<b>SECTION D.9 FACILITY OPERATION CONDITIONS</b>	<b>45</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>45</b>
D.9.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]	45
D.9.2 PSD Minor Limit [326 IAC 2-2]	45
D.9.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	45
<b>Compliance Determination Requirements</b>	<b>45</b>
D.9.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	45
D.9.5 VOC Emissions [326 IAC 2-2]	45
D.9.6 HAP Emissions [40 CFR Part 63] [326 IAC 20]	45
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>45</b>
D.9.7 Record Keeping Requirements	45
D.9.8 Reporting Requirements	46
<b>SECTION D.10 FACILITY OPERATION CONDITIONS</b>	<b>47</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>47</b>
D.10.1 PSD Minor Limit [326 IAC 2-2]	47
D.10.2 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	47
D.10.3 Particulate Matter (PM) [40 CFR 52 Subpart P]	47
<b>Compliance Determination Requirements</b>	<b>47</b>
D.10.4 VOC Emissions [326 IAC 2-2]	47
D.10.5 HAP Emissions [40 CFR Part 63] [326 IAC 20]	47
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>47</b>
D.10.6 Record Keeping Requirements	47
D.10.7 Reporting Requirements	48
<b>SECTION D.11 FACILITY OPERATION CONDITIONS</b>	<b>49</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>49</b>
D.11.1 Particulate [326 IAC 6-3-2]	49
D.11.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	49
<b>Compliance Determination Requirements</b>	<b>49</b>
D.11.3 Particulate Control	49
<b>SECTION D.12 FACILITY OPERATION CONDITIONS</b>	<b>50</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>50</b>
D.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P]	50
<b>SECTION E.1 FACILITY OPERATION CONDITIONS</b>	<b>51</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>51</b>
E.1.1 PSD Minor Limit [326 IAC 2-2]	51
E.1.2 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]	52
<b>Compliance Determination Requirements</b>	<b>52</b>
E.1.3 VOC Emissions [326 IAC 2-2]	52
E.1.4 HAP Emissions [40 CFR Part 63] [326 IAC 20]	52
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	<b>53</b>
E.1.5 Record Keeping Requirements	53
E.1.6 Reporting Requirements	54
<b>CERTIFICATION</b>	<b>55</b>
<b>EMERGENCY OCCURRENCE REPORT</b>	<b>56</b>
<b>FESOP Quarterly Report</b>	<b>58</b>
<b>FESOP Quarterly Report</b>	<b>59</b>
<b>FESOP Quarterly Report</b>	<b>60</b>
<b>FESOP Quarterly Report</b>	<b>61</b>
<b>FESOP Quarterly Report</b>	<b>62</b>
<b>FESOP Quarterly Report</b>	<b>63</b>

**FESOP Quarterly Report .....64**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT .....65**

## 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, A.3, and A.4 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 2-8-3(b)]

---

The Permittee owns and operates a stationary motor home manufacturing operation.

Authorized individual:	President
Source Address:	52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514
Mailing Address:	P.O. Box 2888, Elkhart, IN 46515-2888
General Source Phone:	(574)-266-0924
SIC Code:	3792
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

### A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

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This stationary motor home manufacturing operation consists of four (4) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514; and
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514.

The following are reasons why OAQ combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.
- (b) Plants 1, 2, 3, and 9 share the same SIC code, which is 3792.
- (c) Plants 1, 2, 3, and 9 are all owned by the same company.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

The following equipment is located in Plants 1, 2, and 3.

- (a) One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.
- (b) One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.

- (c) One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels method of application is flow coating, and exhausting to ventilation fans E5 and E6.
- (d) One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.
- (e) One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.

The following equipment is located in Plant 9.

- (f) One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.
- (g) One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.
- (h) One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.
- (i) One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.
- (j) A woodworking shop located in plant 9, using a cyclone and a baghouse for control. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

The exhaust fans E1, E2, and E3 at plant 9 are separate and different from ventilation fans E1, E2, and E3 at plants 1, 2, and 3.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Space heaters, process heaters, or boilers using the following fuels:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.

- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.



The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.

- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.
- (l) Paved and unpaved roads and parking lots with public access.

**A.5 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to transition to a Federally Enforceable State Operating Permit (FESOP).

**A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.

- (b) All previous registrations and permits are superseded by this permit.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2 Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4 Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall-maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
  - (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Telephone No.: 574-245-4870 (ask for A-O Elkhart Inspector)

Facsimile No.: 574-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of

capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:



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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.19 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emissions Limitations and Standards [326 IAC 2-8-4(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitations shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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If a regulated substance as defined in is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.



C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The reporting periods shall be based on calendar years.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for 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.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.

(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 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating booth, Chassis Prep Frame Coating, shall be limited by the following:

The volatile organic compound (VOC) content of extreme performance coatings applied to miscellaneous metal parts or products shall be limited to three and a half (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating booth, Chassis Prep Frame Coating, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.1.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating booth, Chassis Prep Frame Coating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

#### D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating booth, Chassis Prep Frame Coating, shall be controlled by dry filters; and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

## **Compliance Determination Requirements**

### **D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content limitation contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **D.1.9 VOC Emissions [326 IAC 2-2]**

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Compliance with the VOC usage limit in condition D.1.3 shall be determined by the requirements of Section E.1.3.

### **D.1.10 HAP Emissions [40 CFR Part 63] [326 IAC 20]**

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Compliance with the HAP emission limit in condition D.1.4 shall be determined by the requirements of Section E.1.4.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.1.11 Monitoring**

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- (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 coating booth stack E4 while the booth is 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 deviation from 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 deviation from 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 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.12 Record Keeping Requirements**

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- (a) To document compliance with conditions D.1.1, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.1.1, the VOC usage limit established in condition D.1.3, and the HAP emission limits established in condition D.1.4.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) All records required by Section E.1.5.
- (b) To document compliance with condition D.1.11, the Permittee shall maintain a log of

weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

#### D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.1.3 and D.1.4 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).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.

(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 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total quantity of VOC delivered to the coating applicators and solvents used in the coating facility, Chassis Prep Assembly, shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

#### D.2.2 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.2.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Chassis Prep Assembly, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

### Compliance Determination Requirements

#### D.2.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.6 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.2.2 shall be determined by the requirements of Section E.1.3.

#### D.2.7 HAP Emissions [40 CFR Part 63] [326 IAC 20] [326 IAC 20]

Compliance with the HAP emission limit in condition D.2.3 shall be determined by the requirements of Section E.1.4.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.1, the VOC usage limit established in condition D.2.2, and the HAP emission limits established in condition D.2.3.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent 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 total VOC usage for each month.
  - (4) The total weight of VOCs used for each compliance period.
  - (5) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.2.1, D.2.2, and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels, method of application is flow coating, and exhausting to ventilation fans E5 and E6.

(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 2-8-4(1)]

##### D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating facility, Sidewall and Roof Lamination, shall be limited by the following:

The volatile organic compound (VOC) content of coatings, classified as other, applied to miscellaneous metal parts or products shall be limited to three (3.0) pounds of VOC per gallon of coating, excluding water, delivered to the applicator.

##### D.3.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating facility, Sidewall and Roof Lamination, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

##### D.3.3 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

##### D.3.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### Compliance Determination Requirements

##### D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

##### D.3.6 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.3.3 shall be determined by the requirements of Section E.1.3.

##### D.3.7 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.3.4 shall be determined by the requirements of Section E.1.4.



## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.3.8 Record Keeping Requirements**

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- (a) To document compliance with conditions D.3.1, D.3.3, and D.3.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.3.1, the VOC usage limit established in condition D.3.3, and the HAP emission limits established in condition D.3.4.
- (1) The VOC content of each coating material and solvent used less water.
- (2) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.3.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.3.3 and D.3.4 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.

(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 2-8-4(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total quantity of VOC delivered to the coating applicators and solvents used in the coating facility, Baggage Door Assembly, shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

#### D.4.2 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.4.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

### Compliance Determination Requirements

#### D.4.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.4.5 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.4.2 shall be determined by the requirements of Section E.1.3.

#### D.4.6 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.4.3 shall be determined by the requirements of Section E.1.4.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.4.7 Record Keeping Requirements

(a) To document compliance with conditions D.4.1, D.4.2, and D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.4.1, the VOC usage limit established in condition D.4.2, and the HAP emission limits established in condition D.4.3.

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

- (2) The amount of coating material and solvent 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 total VOC usage for each month.
  - (4) The total weight of VOCs used for each compliance period.
  - (5) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.4.1, D.4.2, and D.4.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.5 FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.

(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 2-8-4(1)]

#### D.5.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating facility, Floor Lamination, shall be limited by the following:

The volatile organic compound (VOC) content of coatings, classified as other, applied to miscellaneous metal parts or products shall be limited to three (3.0) pounds of VOC per gallon of coating, excluding water, delivered to the applicator.

#### D.5.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating facility, Floor Lamination, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.5.3 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.5.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

### Compliance Determination Requirements

#### D.5.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Conditions D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.5.6 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.5.3 shall be determined by the requirements of Section E.1.3.

#### D.5.7 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.5.4 shall be determined by the requirements of Section E.1.4.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.5.8 Record Keeping Requirements**

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- (a) To document compliance with conditions D.5.1, D.5.3, and D.5.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.5.1, the VOC usage limit established in condition D.5.3, and the HAP emission limits established in condition D.5.4.
- (1) The VOC content of each coating material and solvent used less water.
- (2) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.5.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.5.3 and D.5.4 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.6

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.

(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 2-8-4(1)]

#### D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Wood Furniture Coating (located at plant 9) applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

Heat Set Strips Application is accepted alternative method of application for Roller Coating. Heat Set Strips is the technology used to apply coating (adhesive) to substrate by having the coating already applied to a web. The web is placed between the two substrates and heat is applied. The heat causes the coating to bond with the substrate.

#### D.6.2 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.6.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.6.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Wood Furniture Coating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

## **Compliance Determination Requirements**

### **D.6.5 VOC Emissions [326 IAC 2-2]**

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Compliance with the VOC usage limit in condition D.6.2 shall be determined by the requirements of Section E.1.3.

### **D.6.6 HAP Emissions [40 CFR Part 63] [326 IAC 20]**

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Compliance with the HAP emission limit in condition D.6.3 shall be determined by the requirements of Section E.1.4.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.6.7 Record Keeping Requirements**

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(a) To document compliance with conditions D.6.2 and D.6.3, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.6.2, and the HAP emission limits established in condition D.6.3.

(1) All records required by Section E.1.5.

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

### **D.6.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.6.2 and D.6.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.7

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.

(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 2-8-4(1)]

#### D.7.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total quantity of VOC delivered to the coating applicators and solvents used in the coating assembly line, Plant 9 Assembly, shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

#### D.7.2 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.7.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.7.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Plant 9 Assembly, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

### Compliance Determination Requirements

#### D.7.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in condition D.7.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.7.6 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.7.2 shall be determined by the requirements of Section E.1.3.

#### D.7.7 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.7.3 shall be determined by the requirements of Section E.1.4.



## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.7.8 Record Keeping Requirements**

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- (a) To document compliance with conditions D.7.1, D.7.2, and D.7.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.7.1, the VOC usage limit established in condition D.7.2, and the HAP emission limits established in condition D.7.3.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent 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 total VOC usage for each month.
  - (4) The total weight of VOCs used for each compliance period.
  - (5) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.7.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.7.1, D.7.2, and D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.8

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.

(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 2-8-4(1)]

#### D.8.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating booth, Undercoating, shall be limited by the following:

The volatile organic compound (VOC) content of the extreme performance coatings applied to miscellaneous metal parts or products shall be limited to three and a half (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator.

#### D.8.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating booth, Undercoating, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.8.3 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.8.4 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.8.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating booth, Undercoating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

#### D.8.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating booth, Undercoating, shall be controlled by dry filters; and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.8.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

## **Compliance Determination Requirements**

### **D.8.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content limitation contained in condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **D.8.9 VOC Emissions [326 IAC 2-2]**

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Compliance with the VOC usage limit in condition D.8.3 shall be determined by the requirements of Section E.1.3.

### **D.8.10 HAP Emissions [40 CFR Part 63] [326 IAC 20]**

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Compliance with the HAP emission limit in condition D.8.4 shall be determined by the requirements of Section E.1.4.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.8.11 Monitoring**

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- (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 coating booth stack E3 while the booth is 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 deviation from this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.8.12 Record Keeping Requirements**

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- (a) To document compliance with conditions D.8.1, D.8.3, and D.8.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.8.1, the VOC usage limit established in condition D.8.3, and the HAP emission limits established in condition D.8.4.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) All records required by Section E.1.5.
- (b) To document compliance with Condition D.8.11, the Permittee shall maintain a log of the weekly overspray observations, daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.8.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with conditions D.8.3 and D.8.4 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).

## SECTION D.9

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.

(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 2-8-4(1)]

#### D.9.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total quantity of VOC delivered to the coating applicators and solvents used in the Final Cleaning operation shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

#### D.9.2 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.9.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

### Compliance Determination Requirements

#### D.9.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in condition D.9.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.9.5 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.9.2 shall be determined by the requirements of Section E.1.3.

#### D.9.6 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.9.3 shall be determined by the requirements of Section E.1.4.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.9.7 Record Keeping Requirements

(a) To document compliance with conditions D.9.1, D.9.2, and D.9.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.9.1, the VOC usage limit established in condition D.9.2, and the HAP emission limits established in condition D.9.3.

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

- (2) The amount of coating material and solvent 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 total VOC usage for each month.
  - (4) The total weight of VOCs used for each compliance period.
  - (5) All records required by Section E.1.5.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.9.8 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.9.1, D.9.2, and D.9.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.10

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

Touch Up and Repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.

(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 2-8-4(1)]

#### D.10.1 PSD Minor Limit [326 IAC 2-2]

VOC usage shall be limited by the requirement of Section E.1.1.

#### D.10.2 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]

HAP emissions shall be limited by the requirement of Section E.1.2.

#### D.10.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from Touch Up and Repair shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

### Compliance Determination Requirements

#### D.10.4 VOC Emissions [326 IAC 2-2]

Compliance with the VOC usage limit in condition D.10.1 shall be determined by the requirements of Section E.1.3.

#### D.10.5 HAP Emissions [40 CFR Part 63] [326 IAC 20]

Compliance with the HAP emission limit in condition D.10.2 shall be determined by the requirements of Section E.1.4.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.10.6 Record Keeping Requirements

(a) To document compliance with conditions D.10.1 and D.10.2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.10.1 and the HAP emission limits established in condition D.10.2.

(1) All records required by Section E.1.5.

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

#### D.10.7 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.10.1, and D.10.2 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).



## SECTION D.11

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

A woodworking shop located in plant 9, using a cyclone and a baghouse for control. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

(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 2-8-4(1)]

#### D.11.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking shop shall not exceed 1.51 pounds per hour when operating at a process weight rate of 453 pounds per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

#### D.11.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.11.3 Particulate Control

Pursuant to T 039-6434-00407, issued on December 22, 1998, and in order to comply with D.11.1, the cyclone and baghouse for particulate control shall be in operation and control emissions from woodworking shop at all times that the woodworking shop is in operation.

## SECTION D.12

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (a) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (b) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (c) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (d) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (e) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (f) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.

(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 2-8-4(1)]

#### D.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the woodworking shop at Plant 1, the woodworking equipment at Plant 2, the woodworking equipment at Plant 3, the window routers, and the metal inert gas welders shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

## SECTION E.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.
- (b) One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.
- (c) One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels method of application is flow coating, and exhausting to ventilation fans E5 and E6.
- (d) One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.
- (e) One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.
- (f) One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.
- (g) One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.
- (h) One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.
- (i) One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.
- (j) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.

(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 2-8-4(1)]

#### E.1.1 PSD Minor Limit [326 IAC 2-2]

The VOC usage at units; Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly, Undercoating, Final Cleaning Operations, and Touch Up and Repair; shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**E.1.2 Hazardous Air Pollutants (HAPs) [40 CFR Part 63] [326 IAC 20]**

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The emissions of any single HAP and any combination of HAPs from units; Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly, Undercoating, Final Cleaning Operations, and Touch Up and Repair; shall be limited to less than 9.93 and 24.92 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

This limit shall render the requirements of 40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants) not applicable.

**Compliance Determination Requirements**

**E.1.3 VOC Emissions [326 IAC 2-2]**

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Compliance with condition E.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance shall be determined within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months' total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

$$VOC\ emitted\ ?\ A1$$

Where

A1 = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on units, Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly, Undercoating, Final Cleaning Operations, and Touch Up and Repair.

**E.1.4 HAP Emissions [40 CFR Part 63] [326 IAC 20]**

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Compliance with condition E.1.2 shall be determined within 30 days of the end of each month. Compliance with the any single HAP limit shall be based on the total of each single HAP emitted for the previous month, and adding it to previous 11 months total of each single HAP emitted so as to arrive at each single HAP emissions for the most recent 12 consecutive month period. Compliance with the combination of HAPs limit shall be based on the total of all of HAPs emitted for the previous month, and adding it to previous 11 months' total of all of HAPs emitted so as to arrive at the combination of any HAPs emissions for the most recent 12 consecutive month period. The HAP emissions for a month can be arrived at using the following equation:

$$HAP\ emitted\ ?\ AH$$

Where

AH = The total amount of each HAP or all HAPs, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on units, Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly, Undercoating, Final Cleaning Operations, and Touch Up and Repair.

- (a) For Fine mineral Fibers (FMF), the emissions shall be:

$$FMF\text{ Emitted} = AFMF \cdot TF \cdot \frac{TE}{100}$$

Where:

AFMF= The mass of FMF supplied to the applicator

TF = The transfer efficiency. The transfer efficiency shall be lowest applicable efficiency list in AP-40 pages 859-861. The Table from AP-40 is attached as Appendix C.

- (b) For non reactive HAPs in coatings, the emissions shall be the total amount used.
- (c) For 4-4' Methylenediphenyl diisocyanate (MDI), the emissions shall be based upon:
- (1) The MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry published by the Alliance for the Polyurethanes Industry (API), or
  - (2) Any of the other options for the reactive HAPs below.
- (d) For reactive HAPs, including MDI, in coatings, the emission shall be based upon:
- (1) Manufacturer's data that expressly states the organic HAP mass fraction emitted.
  - (2) Method 311 (appendix A to 40 CFR part 63).
  - (3) Assume the nonaqueous volatile matter mass fraction determined by Method 24 is the mass fraction of each organic HAP emitted.
  - (4) Assume the nonaqueous volatile matter mass fraction determined by the alternative method contained in appendix A to subpart PPPP of 40 CFR Part 63 is the mass fraction of each organic HAP emitted.

Neither method in (3) and (4) above shall be used for HAP that the given method states is not applicable.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **E.1.5 Record Keeping Requirements**

- (a) To document compliance with conditions E.1.1 and E.1.2, the Permittee shall maintain records in accordance with (1) through (9) below. Records maintained for (1) through (9) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition E.1.1 and the HAP emission limits established in condition E.1.2.
- (1) The VOC and HAP content of each coating.
  - (2) For Reactive HAPs,
    - (A) A log of which method is being used to determine the HAP emission rate for each HAP.
    - (B) All applicable records for the chosen method or methods

- (i) All information and a brief description of how they were gathered required to conduct the calculation in the guidance from API
  - (ii) All records required by method 311.
  - (iii) All records required by method 24.
  - (iv) All records required by the alternative method in Appendix A of subpart PPPP of 40 CFR Part 63.
- (3) For Fine Mineral Fibers, the transfer efficiency.
  - (4) The amount of coating material and solvent 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.
  - (5) The monthly cleanup solvent usage; and
  - (6) The total VOC usage for each month.
  - (7) The total HAP emissions for each month
  - (8) The total weight of VOC usage for each compliance period.
  - (9) The total weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### E.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with conditions E.1.1 and E.1.2 shall be submitted to the addresses 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407

**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:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) \_\_\_\_\_
- ? Report (specify) \_\_\_\_\_
- ? Notification (specify) \_\_\_\_\_
- ? Affidavit (specify) \_\_\_\_\_
- ? 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407

**This form consists of 2 pages**

**Page 1 of 2**

<p>? 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) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p>
---

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:



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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
 Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
 Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
 FESOP No.: F 039-17521-00407  
 Facility: Chassis Prep Assembly  
 Parameter: VOC usage  
 Limit: 25 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- ? No deviation occurred in this quarter.
- ? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407  
Facility: Baggage Door Assembly  
Parameter: VOC usage  
Limit: 25 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

? No deviation occurred in this quarter.

? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
 Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
 Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
 FESOP No.: F 039-17521-00407  
 Facility: Plant 9 Assembly  
 Parameter: VOC usage  
 Limit: 25 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- ? No deviation occurred in this quarter.
- ? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407  
Facility: Final Cleaning operation  
Parameter: VOC usage  
Limit: 25 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- ? No deviation occurred in this quarter.
- ? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
 Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
 Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
 FESOP No.: F 039-17521-00407  
 Facility: Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination,  
 Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly,  
 Undercoating, Final Cleaning Operations, and Touch Up and Repair  
 Parameter: VOC usage  
 Limit: 99.4 tons per twelve consecutive month period with compliance determined at  
 the end of each month.

YEAR: \_\_\_\_\_

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

? No deviation occurred in this quarter.

? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407  
Facility: Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination,  
Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly,  
Undercoating, Final Cleaning Operations, and Touch Up and Repair  
Parameter: HAP Emissions  
Limit: The emissions of any single HAP shall be limited to less than 9.93 per twelve  
(12) consecutive month period with compliance determined at the end of each  
month.

HAP: \_\_\_\_\_

YEAR: \_\_\_\_\_

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

? No deviation occurred in this quarter.

? 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**

**FESOP Quarterly Report**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
 Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
 Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
 FESOP No.: F 039-17521-00407  
 Facility: Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination,  
 Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly,  
 Undercoating, Final Cleaning Operations, and Touch Up and Repair  
 Parameter: HAP Emissions  
 Limit: The emissions of any combination of HAPs shall be limited to less than 24.92  
 tons per twelve (12) consecutive month period with compliance determined at the  
 end of each month.

YEAR: \_\_\_\_\_

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

- ? No deviation occurred in this quarter.
- ? 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Damon Corporation Plts. 1, 2, 3, and 9  
Source Address: 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
FESOP No.: F 039-17521-00407

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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".	
? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document (TSD) for a Federally Enforceable State  
Operating Permit (FESOP) Transition

**Source Name:** Damon Corporation Plts. 1, 2, 3, and 9  
**Source Location:** 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** F039-17521-00407  
**Permit Reviewer:** Jed D. Wolkins

On November 12, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Damon Corporation Plts. 1, 2, 3, and 9 (Damon) had applied for a transition of their Part 70 Operating Permit to a FESOP for a stationary motor home manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (**bolded** language has been added and the language with a ~~line through it~~ has been deleted). The Table Of Contents has been modified to reflect these changes.

- (a) The statement referring to noncompliance with not federally enforceable conditions has been removed from the front page. All conditions in a FESOP are federal ly enforceable. The bold language is intended to remain bold. No language was added.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.**  
~~Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

- (b) OAQ has added [IC 13-17-3-2] to the title of condition B.20.

**B.20 Inspection and Entry** [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] **[IC 13-17-3-2]** [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions

related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements;

Comment: Fix bullet on down

- (c) The statements referring to part or all of conditions C.1, C.4, C.5, C.6, C.8, D.1.6, and D.8.6 as not federally enforceable have been removed. All conditions in a FESOP are federally enforceable.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

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- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~This condition is not federally enforceable.~~

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~This condition is not federally enforceable.~~

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326

IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating booth, Chassis Prep Frame Coating, shall be controlled by dry filters; and the Permittee shall operate the control device in accordance with manufacturer's specifications. ~~This requirement to operate the control is not federally enforceable.~~

D.8.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating booth, Undercoating, shall be controlled by dry filters; and the Permittee shall operate the control device in accordance with manufacturer's specifications. ~~This requirement to operate the control is not federally enforceable.~~

- (d) OAQ has decided to change references to "source" to "Permittee" in conditions C.9, C.13, and C.18.

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The reporting periods shall be based on calendar years.
- (e) OAQ has modified the notification requirement in paragraph (b)(3) of condition C.14 Compliance Response Plan – Preparation, Implementation, Records, and Reports. The changes are for grammatical reasons. The requirements of the conditions are unchanged.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that

the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, . **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- (f) The date the emission statement is due has been specifically stated in condition C.16. The emission statement rule is currently under revision. The previous version of this condition was designed to be flexible for those sources whose emission statement requirements will change. Damon has PTE for VOCs greater than ten (10) tons per year and is located in Elkhart county. Under the current rule and the proposed changes Damon will have to submit emission statements annually by April 15. Therefore, OAQ will change condition C.16.

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an **annual** emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received ~~in accordance with the compliance schedule specified in 326 IAC 2-6-3~~ **by April 15 of each year** and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:



Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (g) The equation for determining the emission limit for particulate matter has been reformatted in conditions D.1.5, D.6.4, D.7.4, D.8.5, D.10.3, D.12.1. The requirement of the condition is unchanged.

D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating booth, Chassis Prep Frame Coating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.6.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Wood Furniture Coating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.7.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Plant 9 Assembly, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.8.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating booth, Undercoating, shall not exceed the pound per hour

emission rate established as E in the following formula:

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

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

#### D.10.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from Touch Up and Repair shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the woodworking shop at Plant 1, the woodworking equipment at Plant 2, the woodworking equipment at Plant 3, the window routers, and the metal inert gas welders shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (h) OAQ has decided to require daily inspections of the filter placement on Chassis Prep Frame Coating and Undercoating. This frequency of inspections is necessary to certify compliance on a continuous basis.

#### D.1.11 Monitoring

- (a) ~~Weekly~~ **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 coating booth stack E4 while the booth is 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 deviation from 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 deviation from this permit.

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

#### D.8.11 Monitoring

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- (a) ~~Weekly~~ **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 coating booth stack E3 while the booth is 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 deviation from this permit.
  - (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (i) The record keeping conditions for on Chassis Prep Frame Coating and Undercoating have been changed to match the change in monitoring.

#### D.1.12 Record Keeping Requirements

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- (a) To document compliance with conditions D.1.1, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.1.1, the VOC usage limit established in condition D.1.3, and the HAP emission limits established in condition D.1.4.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) All records required by Section E.1.5.
- (b) To document compliance with condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, ~~weekly~~ **daily** and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.8.12 Record Keeping Requirements

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- (a) To document compliance with conditions D.8.1, D.8.3, and D.8.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.8.1, the VOC usage limit established in condition D.8.3, and the HAP emission limits established in condition D.8.4.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) All records required by Section E.1.5.
- (b) To document compliance with Condition D.8.11, the Permittee shall maintain a log of the weekly overspray observations, ~~weekly and monthly~~ **daily** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- (j) The cover page to Appendix A listed seven total pages. The Appendix A actually has eight pages. The cover page has been corrected.

### Pages 1 to 78

On November 17, 2003 David Everett submitted comments on behalf of Damon. The summary of the comments is as follows.

**Comment 1:** Pages 58 through 64 of the permit include forms for quarterly recording and reporting of VOC and HAPs usage on a rolling twelve month basis. The recording and reporting is required by section E of the permit. Damon has not been required to keep this data under the current Title V permit. For quarterly reporting purposes, should we submit data in Column 1 until the 12<sup>th</sup> month of the permit when we have accurate data for the previous 11 months?

**Response to Comment 1:** OAQ realizes that Damon will not have data for the last eleven months until the twelve months after issuance of this permit. Damon should report in Column 2 the usage or emission, as required, from the issuance of the FESOP to the end of the previous month until there are eleven previous months. Damon should report in Column 3 the usage or emission, as required, from the issuance of the FESOP to end of the month in question until there are eleven previous months. Once Damon has eleven months of records, Damon should report as the forms are set up. The intent of the reporting requirement is to demonstrate that Damon's usages or emissions, as required are less than the permit limits, which are on a twelve month rolling basis. The requirement to keep these records starts with the issuance of the FESOP.

If the permit is issued on December 11, 2003 and Damon used the following total tons of VOCs for the units covered under condition E.1.1 from December 11, 2003 to March 31, 2004:

Month	VOC (tons)
December 11, 2003 to December 31, 2003	4
January, 2004	6
February, 2004	4
March, 2004	5

then the report for the fourth quarter of 2003 would be:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous Months From Issuance	Since Issuance Total
Month 1 N/A	N/A	N/A	N/A
Month 2 N/A	N/A	N/A	N/A

Month 3 December	4	N/A	4
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and for the first quarter of 2004 would be:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous Months From Issuance	Since Issuance Total
Month 1 January	6	4	10
Month 2 February	4	10	14
Month 3 March	5	14	19

Damon would fill out the other reporting forms in a similar manner.

Under the reporting requirement condition, the Damon can use the forms attached or their equivalent. This allows Damon to change the heading of Column 2 and Column 3 as long as the intent of the reporting requirement and record keeping requirement is met.

No change was made to the permit as a result of this comment.

**Comment 2:** The permit contains a dearth of reporting requirements.

**Response to comment 2:** The reporting requirements are needed to ensure continuous compliance with the related applicable limit or standard. 326 IAC 2-8-4 requires all FESOPs contain monitoring, record keeping, and reporting requirements that assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. The reporting required in conditions D.1.13, D.2.9, D.3.9, D.4.8, D.5.9, D.6.8, D.7.9, D.8.13, D.9.8, D.10.7, and E.1.6 meet the requirement of 326 IAC 2-8-4. These conditions are consistent with OAQ's implementation of 326 IAC 2-8-4.

Conditions D.2.9, D.4.8, D.7.9, and D.9.8 contain reporting for individual unit limits to avoid 326 IAC 8-1-6. Each limit must have a reporting condition to be enforceable.

The other reporting requirements of conditions D.2.9, D.4.8, D.7.9, and D.9.8 and the reporting requirements of conditions D.1.13, D.3.9, D.5.9, D.6.8, D.8.13, and D.10.7 are for the VOC and HAP limits to make Damon a minor Title V source, a minor PSD source, and an area HAP source. Damon has taken combined limits on the units in the above sections D.1, D.2, D.3, D.4, D.5, D.6, D.7, D.8, D.9, and D.10. As required by condition C.2 Overall Source Limit, section D of this permit must contain independently enforceable provisions to satisfy the rest of condition C.2. Therefore, each D section must contain the reporting requirement for the Overall Source Limit to be enforceable. Condition E.1.6 also repeats the requirement as section E.1 has been created to hold those limits which are referenced by the each D section with units involved in the limits. Legally the reporting requirement must be repeated in every involved section. Damon does not have to submit eleven copies of the set of the required reports (a report of VOC usage, a report of each HAP emission, and a report of total HAP emissions). Only one set (a report of VOC usage, a report of each HAP emission, and a report of total HAP emissions) is required to meet all eleven reporting requirements.

No change was made to the permit as a result of this comment.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Transition

#### Source Background and Description

**Source Name:** Damon Corporation Plts. 1, 2, 3, and 9  
**Source Location:** 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** F039-17521-00407  
**Permit Reviewer:** Jed D. Wolkins

The Office of Air Quality (OAQ) has reviewed a FESOP transition application from Damon Corporation relating to the operation of stationary motor home manufacturing operation. Damon Corporation was issued T 039-6434-00407 on December 22, 1998.

#### Source Definition

The Source Definition from the previous Part 70 permit's TSD was incorporated into this permit as follows:

This stationary motor home manufacturing operation consists of four (4) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514; and
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514.

The following are reasons why OAQ has combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.
- (b) Plants 1, 2, 3 and 9 share the same SIC code which is 3792.
- (c) Plants 1, 2, 3 and 9 are all owned by the same company.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

The following equipment is located in Plants 1, 2, and 3.

- (a) One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.

- (b) One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.
- (c) One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels method of application is flow coating, and exhausting to ventilation fans E5 and E6.
- (d) One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.
- (e) One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.

The following equipment is located in Plant 9.

- (f) One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.
- (g) One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.
- (h) One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.
- (i) One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.
- (j) A woodworking shop located in plant 9, using a cyclone and a baghouse for control. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

The exhaust fans E1, E2, and E3 at plant 9 are separate and different from ventilation fans E1, E2, and E3 at plants 1, 2, and 3.

### **Insignificant Activities**

- (a) Space heaters, process heaters, or boilers using the following fuels:  
  
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.



The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.

- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.

The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.

- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.
- (l) Paved and unpaved roads and parking lots with public access.

### **Emission Unit Name Changes**

The following units have been renamed to more accurately describe their function and for clarity. These name changes represent no physical or operational modification to the units. Some units have had physical and operational modifications; however, these modifications reduced potential emissions.

- (a) The first Chassis Prep has been renamed Chassis Prep Frame Coating,

- (b) The second Chassis Prep has been renamed Chassis Prep Assembly,
- (c) Sidewall Lamination has been renamed Sidewall and Roof Lamination. The unit has always produced sidewalls and roofs.
- (d) Coating Assembly Line at Plant 9 has been renamed Plant 9 Assembly.

The following unit's descriptions have been split up in this permit, to more accurately describe their function and for clarity. These separations represent no physical or operational modification to the units. Some units have had physical and operational modifications; however, these modifications reduced potential emissions.

- (a) The window router has been split from the Sidewall Lamination.
- (b) The Wood Furniture Coating, Final Cleaning operation, and Touch Up and Repair have been split from coating assembly line at Plant 9.

### Source History

Plant 2 and 3 existed prior to 1984 and produced recreational vehicles using the operations above. Plant 1 was purchased in 1988. Operations already occurring at the source were moved to Plant 1. Plant 9 was built in 1994. Operations already occurring at the source were moved to Plant 9.

### Existing Approvals

- (a) T 039-6434-00407, issued on 12/22/1998; and expires 12/22/2003,
- (b) AA 039-10524-00407, issued on 1/26/1999,
- (c) AA 039-12393-00407, issued on 8/3/2000, and
- (d) RO 039-13222-00407, issued on 1/03/2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

The following terms and conditions from previous approvals have been revised in this Part 70 permit: (The **bold** language is new language that has been added, and the language with a ~~line through~~ it has been removed.)

- (a) Condition B.9 Compliance with Permit Conditions
  - (a) ~~The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:~~
    - (1) ~~Enforcement action;~~
    - (2) ~~Permit termination, revocation and reissuance or modification; or for~~
    - (3) ~~Denial of a permit renewal application.~~
  - (b) ~~It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

Reason revised: IDEM, OAQ has decided to move the provision that is required by 326 IAC 2-7-5(6) from B.9 to the front of the permit. The added language is intended to remain bold. Here the added language is **double bolded**. The language has been updated to match current rules.

(b) Section D.1 Facility Description

Facility Description [326 IAC 2-8-4(10)]

~~(a)~~ One (1) coating booth, identified as Chassis Prep **Frame Coating**, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.

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

Reason revised: The description has been changed more accurately describe their function and for clarity. No physical or operational modification has been done to the units. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

(c) Condition D.1.1 Volatile Organic Compounds (VOC) Limitations

~~(a)~~ Pursuant to **T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating booth, Chassis Prep Frame Coating, shall be limited by the following:**

**The volatile organic compound (VOC) content of extreme performance coatings applied to ~~sheets of metal~~ miscellaneous metal parts or products shall be limited to three and a half (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator.:-**

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
<del>Clear Coat</del>	4.3
<del>Extreme Performance Coat</del>	3.5
<del>All Other Coat</del>	3.0

~~(b) If more than one (1) emission limitation in section D.1.1 applies to a specific coating then the least stringent emission limitation shall be applied.~~

### **D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements**

~~(c) Solvent Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating booth, Chassis Prep Frame Coating, during cleanup or color changes shall be directed into containers. Such Said containers shall be closed as soon as such the solvent spraying is complete, and the. In addition, all waste solvent shall be disposed of in such a manner that evaporation is minimized minimizes evaporation.~~

Reason revised: The reference to metal sheets has been changed to miscellaneous metal parts and products because the term metal sheets was more restrictive than necessary. The booth only applies extreme performance coatings. Therefore, only the limit for extreme performance coatings is stated. The final paragraph was changed to a new condition since the limitations handle separate parts of the operation. Several grammatical changes were made.

(c) Condition D.1.58 Volatile Organic Compounds (VOC)  
 Compliance with the VOC content and usage limitations contained in C conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Reason revised: The reference to usage limitations was the 25 tons per year. Since that limit has been removed, the reference here is removed. The new VOC usage limit is handled separately in condition D.1.9. The source of the data has been changed to reflect current rules.

(d) Condition D.1.611 Monitoring  
 (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack E4 while ~~one or more of the booths are~~ **is** in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Plan - Failure to Take Response Steps,~~ **Response Plan - Preparation, Implementation, Records, and Reports,** shall be considered a ~~violation of deviation from~~ **violation of deviation from** this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Plan - Failure to Take Response Steps~~, **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of deviation from~~ this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason revised: The condition was corrected for numerical errors. The referenced section C condition has been changed to match the rest of the permit. The failure to take response steps has been changed to a "deviation from" a "violation of" to match condition C.14. This change does not change how IDEM will respond to a failure to take response steps.

- (e) Condition D.1.712 Record Keeping Requirements
- (a) To document compliance with ~~C~~conditions D.1.1, **D.1.3 and D.1.4**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ below. Records maintained for (1) through ~~(6)~~ shall be taken ~~monthly~~ **as stated below** and shall be complete and sufficient to establish compliance with the VOC **content limit established in condition D.1.1**, **the VOC usage limits established in condition D.1.3**, and ~~of the VOC HAP~~ emission limits established in ~~C~~condition D.1.14.
- (1) ~~The amount and VOC content of each coating material and solvent used less water. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) **All records required by Section E.1.5.** ~~A log of the dates of use;~~
- (3) ~~The volume weighted VOC content the coatings used, if this method is used to comply with 326 IAC 8-2-9, for each day.~~
- (4) ~~The cleanup solvent usage for each month;~~
- (5) ~~The total VOC usage for each month; and~~
- (6) ~~The weight of VOCs emitted for each compliance period.~~
- (b) To document compliance with condition D.1.611, the Permittee shall maintain a log of weekly overspray observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

Reason revised: The removed requirement were all for the 25 tons per year limit that has been removed. Therefore, the required records have been removed. Record keeping for the new VOC and HAP limits have been added by reference. The records required are spelled out in Section E.1.5.

- (f) Section D.2 Facility Description

Facility Description [326 IAC 2-8-4(10)]

~~(b)~~ One (1) coating facility, identified as Chassis Prep **Assembly**, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.

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

Reason revised: The description has been changed more accurately describe their function and for clarity. No physical or operational modification has been done to the units. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

- (g) Condition D.2.21 Volatile Organic Compounds (VOC)

~~Any change or modification which may increase the potential VOC emissions to 15 pounds per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~ **The total quantity of VOC delivered to the coating applicators and solvents used in the coating facility, Chassis Prep Assembly, shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.**

**This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.**

Reason revised: Since the facility coats plastic pipes and boxes, it is not subject to any of the 326 IAC 8 rules, except 326 IAC 8-1-6. Therefore, the facility would be subject to the requirements of 326 IAC 8-1-6. However, if a facility's potential VOC emissions are limited to less than 25 tons per year, the requirements of 326 IAC 8-1-6 are rendered not applicable. The original Title V permit limited the VOC emissions to 15 pounds per day, which is equal to 2.8 tons per year. While this did render the requirements not applicable, the limit was more restrictive than necessary. The new limit of 25 tons per twelve (12) consecutive months will still render the requirements of 326 IAC 8-1-6 not applicable but will not be overly restrictive.

(h) Section D.3 Facility Description

Facility Description [326 IAC 2-8-4(10)]

~~(c) One (1) coating booth facility, identified as sSidewall and Roof Lamination, coating metal and wood frames and wood panels, method of application is rollcoating and airless-flow coating, and exhausting to ventilation fans E5 and E6. The frames go through a window router which is controlled by a portable dust collector.~~

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

Reason revised: The description has been changed more accurately describe their function and for clarity. The coating is not conducted inside a booth; therefore, the unit is referred to a facility. The sidewalls and roofs have always been laminated in this facility. No physical or operational modification has been done to the units, that would increase the potential to emit of the facility. The coating method has switched to flow coating. The frames still go through a window router. The window router conditions have been moved to section D.12. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

(i) Section D.4 Facility Description

Facility Description [326 IAC 2-8-4(10)]

~~(d) One (1) coating booth facility, identified as bBaggage dDoor aAssembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.~~

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

Reason revised: The description has been changed more accurately describe their function and for clarity. The coating is not conducted inside a booth; therefore, the unit is referred to a facility. No physical or operational modification has been done to the facility. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

(j) D.4.1 Volatile Organic Compounds (VOC)

~~Any change or modification which may increase the potential VOC emissions to 15 pounds per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~ **The total quantity of VOC delivered to the coating applicators and solvents used in the coating facility, Baggage Door Assembly, shall be limited to less than 25 tons per twelve (12) consecutive months with compliance determined at the end of each month.**

**This limit shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.**

Reason revised: Since the facility coats wood/fiberglass doors, it is not subject to any of the 326 IAC 8 rules, except 326 IAC 8-1-6. Therefore, the facility would be subject to the requirements of 326 IAC 8-1-6. However, if a facility's potential VOC emissions are limited to less than 25 tons per year, the requirements of 326 IAC 8-1-6 are rendered not applicable. The original Title V permit limited the

VOC emissions to 15 pounds per day, which is equal to 2.8 tons per year. While this did render the requirements not applicable, the limit was more restrictive than necessary. The new limit of 25 tons per twelve (12) consecutive months will still render the requirements of 326 IAC 8-1-6 not applicable but will not be overly restrictive.

(k) Section D.5 Facility Description

Facility Description [326 IAC 2-8-4(10)]

~~(e)~~ One (1) coating booth facility, identified as Floor Lamination, coating metal flooring, method of application is ~~air assisted~~ **airless flow coating** and hand wipe, and exhausting to ventilation fans E7 and E8.

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

Reason revised: The description has been changed more accurately describe their function and for clarity. The coating is not conducted inside a booth; therefore, the unit is referred to a facility. No physical or operational modification has been done to the units, that would increase the potential to emit of the facility. The coating method has switched to flow coating and hand. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

(l) Condition D.5.1 Volatile Organic Compounds (VOC) Limitations

~~(a)~~ Pursuant to **T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the coating facility, Floor Lamination, shall be limited by the following:**

**The volatile organic compound (VOC) content of coatings, classified as other, applied to ~~sheets of metal~~ miscellaneous metal parts or products shall be limited to three (3.0) pounds of VOC per gallon of coating, excluding water, delivered to the applicator. :**

Coatings	Limit (pounds of VOC/gallon of coating <del>less water delivered to the applicator</del> )
<del>Clear Coat</del>	4.3
<del>Extreme Performance Coat</del>	3.5
<del>All Other Coat</del>	3.0

~~(b) If more than one (1) emission limitation in section D.5.1 applies to a specific coating then the least stringent emission limitation shall be applied.~~

**D.5.2 Volatile Organic Compound (VOC) Limitations, Clean-up**

~~(c)~~ Solvent Pursuant to **T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents** sprayed from the application equipment **of the coating facility, Floor Lamination**, during cleanup or color changes shall be directed into containers. ~~Such Said~~ containers shall be closed as soon as ~~such~~ **the** solvent spraying is complete, ~~and the~~. **In addition, all waste**



solvent shall be disposed of in such a manner that ~~evaporation is minimized~~  
**minimizes evaporation.**

Reason revised: The reference to metal sheets has been changed to miscellaneous metal parts and products because the term metal sheets was more restrictive than necessary. The facility only applies other coatings. Therefore, only the limit for other coatings is stated. The final paragraph was changed to a new condition since the limitations handle separate parts of the operation. Several grammatical changes were made.

- (m) Condition D.5.5 Volatile Organic Compounds (VOC)  
Compliance with the VOC content ~~and usage~~ limitations contained in ~~C~~conditions D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Reason revised: The reference to usage limitations was the 25 tons per year. Since that limit has been removed, the reference here is removed. The new VOC usage limit is handled separately in condition D.5.6. The source of the data has been changed to reflect current rules.

- (n) Condition D.5.78 Record Keeping Requirements
- (a) To document compliance with ~~C~~conditions D.5.1, **D.5.3, and D.5.4**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ below. Records maintained for (1) through ~~(6)~~ shall be taken ~~monthly~~ **as stated below** and shall be complete and sufficient to establish compliance with the **VOC content limit established in condition D.5.1, the VOC usage limit established in condition D.5.3, and/or the VOC HAP emission limits established in Condition D.5.4.**
- (1) ~~The amount and VOC content of each coating material and solvent used~~ **less water.** ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) ~~A log of the dates of use;~~ **All records required by Section E.1.5.**
- (3) ~~The volume weighted VOC content of the coatings used, if this method is used to comply with 326 IAC 8-2-9, for each day.~~
- (4) ~~The cleanup solvent usage for each month;~~
- (5) ~~The total VOC usage for each month; and~~
- (6) ~~The weight of VOCs emitted for each compliance period.~~
- (b) ~~To document compliance with Condition and D.5.5 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Reason revised: All records required for the 25 tons per year limit have been removed. The Permittee no longer has to monitor the facility for particulate emissions; therefore, the related record keeping has been removed. Record keeping for the new VOC and HAP limits have been added by reference. The records required are spelled out in Section E.1.5.

(o) **Section D.86 Facility Description**

Facility Description [326 IAC 2-7-5(15)] ~~The following facilities are located in plant 9:~~

**One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced**

~~(f) One (1) coating assembly line, coating recreational vehicles, method of applications are flowcoating, rolling and wiping, exhausting to exhaust fans E1 and E2.~~

~~(g) One (1) undercoating booth, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.~~

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

**Section D.7 Facility Description**

Facility Description [326 IAC 2-8-4(10)]

**One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.**

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

**Section D.8 Facility Description**

Facility Description [326 IAC 2-8-4(10)]

**One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.**

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

**Section D.9 Facility Description**

Facility Description [326 IAC 2-8-4(10)]

**One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.**

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

### Section D.10 Facility Description

#### Facility Description [326 IAC 2-8-4(10)]

**Touch Up and Repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.**

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

Reason revised: The section has been split up to clarify which rules apply to which facilities. No physical or operational modification has been done to the units, that would increase the potential to emit of the facility. The statement of the non-enforceability has been added to clearly state that fact. Conditions A.3 and A.4 have been changed to match this description.

- (p) Condition D.86.1 Volatile Organic Compounds (VOC)

Pursuant to **T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**, the ~~surface~~ **Wood Furniture Coating (located at plant 9)** applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

**Heat Set Strips Application is accepted alternative method of application for Roller Coating. Heat Set Strips is the technology used to apply coating (adhesive) to substrate by having the coating already applied to a web. The web is placed between the two substrates and heat is applied. The heat causes the coating to bond with the substrate.**

Reason revised: The condition has been revised to match the facility description. The definition of Heat Set Strips has been added since it meets the intent of the rule but is not specifically listed. This condition only applies to the Wood Furniture Coating.

- (q) Condition D.8.21 Volatile Organic Compounds (VOC)  
Pursuant to **T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (Miscellaneous metal coating operations)**, the **coating booth, Undercoating, shall be limited by the following:**

The volatile organic compound (VOC) content of extreme performance coatings applied to ~~prefabricated recreational vehicle frames~~ **miscellaneous metal parts or products** shall be limited to **three and a half (3.5) pounds VOC per gallon of coating, excluding water**, delivered to the applicator. ~~less water for air dried coating.~~

#### **D.8.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements**

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~~Solvent~~ Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the coating booth, Undercoating, during cleanup or color changes shall be directed into containers. ~~Such Said~~ containers shall be closed as soon as ~~such the~~ solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that ~~that evaporation is minimized~~ **minimizes evaporation.**

Reason revised: The reference to prefabricated recreational vehicle frames has been changed to miscellaneous metal parts and products because prefabricated recreational vehicle frames was more restrictive than necessary. The extreme performance coatings are air dried. The limit for extreme performance and air dried coatings are the same. Since the product needs dictate that the coating will an extreme performance coating, extreme performance coating is the listed coating. The final paragraph was changed to a new condition since the limitations handle separate parts of the operation. Several grammatical changes were made. These conditions only apply to Undercoating.

- (r) Condition D. ~~86.34~~ Particulate Matter (PM)  
~~The PM from the two (2) coating booths~~ Pursuant to T 0398-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility Wood Furniture Coating shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

#### **D.7.4 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating facility, Plant 9 Assembly, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

**D.8.5 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating booth, Undercoating, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

**D.10.3 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to T 039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from Touch Up and Repair shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Reason Revised: Each of these facilities above is subject to 40 CFR Part 52 Subpart P. As the facilities have been split into separate sections, this condition had to be split and repeated. The original referred to "two (2) coating booths." The "booths" were coating assembly line and undercoating booth. Wood Furniture Coating and Touch Up and Repair were subject to 326 IAC 6-3, now 40 CFR Part 52 Subpart P, as part of the coating assembly line. Due to the change in the rule, the source of the rule has changed to 40 CFR 52 Subpart P. Also the new version of 326 IAC 6-3 exempts facilities that have potential PM emissions of less than five hundred fifty-one thousandths (0.551) pounds per hour. Wood Furniture Coating, Plant Assembly, and Touch Up and Repair meet this criterion. While the rest of the coating assembly line was subject to 326 IAC 6-3, the Final Cleaning Operation was not and is not subject 326 IAC 6-3 or to 40 CFR 52 Subpart P. The Final Cleaning Operation does not generate PM. The aerosol used is a wood polish containing no solids. The Undercoating is subject to 326 IAC 6-3-2(d). The 326 IAC 6-3-2(d) limit is in condition D.8.6.

- (s) **D.87.45 Volatile Organic Compounds (VOC)**  
Compliance with the VOC content and usage limitations contained in cCondition D.-87.-21 shall be determined pursuant to 326 IAC 8-1-4(a)(3) (A) and 326 IAC 8-1-2(a) (7) using formulation data supplied by the coating manufacturer by **preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.8.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content limitation contained in condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.9.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC usage limitation contained in condition D.9.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Reason revised: As the facilities have been split into separate sections this condition had to be split and repeated. The source of the data has been changed to reflect current rules. The Wood Furniture Coating and Final Cleaning Operation are not subject to individual VOC content or usage limits. Therefore, the condition is not repeated in those sections.

(t) Condition D.8.611 Monitoring

- (a) ~~Daily~~ **Weekly** inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the ~~surface~~ coating booth stack (E3) while ~~one or more of the booths are~~ **is** in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response Plan – Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

The condition was corrected for numerical errors. The referenced section C condition has been changed to match the rest of the permit. The failure to take response steps has been changed to a “deviation from” a “violation of” to match condition C.14. This change does not change how IDEM will respond to a failure to take response steps. The daily inspections were changed to weekly. This matches the monitoring requirement for the Chassis Prep Frame Coating, which has higher potential particulate emissions. The stack exit is along the ground on the side of the building. Therefore, there are no rooftops to observe the

presence of overspray on. Therefore, based on the low potential emissions, the stack exit location, and the inspector's recommendation, the requirement has been removed. The reduced frequency of the monitoring still meets the requirement to monitor per 326 IAC 2-8-4.

- (u) Condition D.86.7 Record Keeping Requirements
- (a) **To document compliance with conditions D.6.2 and D.6.3, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.6.2, and the HAP emission limits established in condition D.6.3.**
- (1) **All records required by Section E.1.3.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.7.8 Record Keeping Requirements**

- (a) To document compliance with ~~C~~conditions ~~D.87.21, D.7.2, and D.7.3,~~ the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken ~~monthly~~ **as stated below** and shall be complete and sufficient to establish compliance with the VOC usage limits **established in condition D.7.1, the VOC usage limit established in condition D.7.2,** and ~~for the VOC~~ **HAP** emission limits established in condition ~~D.87.23~~.
- (1) ~~The amount and~~ VOC content of each coating material and solvent used.
- (2) ~~A log of the dates of use;~~ **The amount of coating material and solvent 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, if this method is used to comply with 326 IAC 8-2-9, for each day.~~
- ~~(4) The cleanup solvent usage for each month;~~
- ~~(5) (3)~~ The total VOC usage for each month.
- ~~(6) (4)~~ The **total** weight of VOCs ~~emitted~~ **used** for each compliance period.
- (5) **All records required by Section E.1.3.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.8.12 Record Keeping Requirements**

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- (a) **To document compliance with conditions D.8.1, D.8.3, and D.8.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.8.1, the VOC usage limit established in condition D.8.3, and the HAP emission limits established in condition D.8.4.**
- (1) **The VOC content of each coating material and solvent used less water.**
- (2) **All records required by Section E.1.5.**
- (b) **To document compliance with Condition D.8.211, the Permittee shall maintain a log of weekly overspray observations, ~~daily-weekly~~ and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.9.7 Record Keeping Requirements**

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- (a) **To document compliance with conditions D.9.1, D.9.2, and D.9.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.9.1, the VOC usage limit established in condition D.9.2, and the HAP emission limits established in condition D.9.3.**
- (1) **The VOC content of each coating material and solvent used.**
- (2) **The amount of coating material and solvent 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 total VOC usage for each month.**
- (4) **The total weight of VOCs used for each compliance period.**
- (5) **All records required by Section E.1.3.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**



#### D.10.6 Record Keeping Requirements

- (a) **To document compliance with conditions D.10.1 and D.10.2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.10.1 and the HAP emission limits established in condition D.10.2.**
- (1) **All records required by Section E.1.3.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Reason revised: As the facilities have been split into separate sections this condition had to be split and repeated. Record keeping for the new VOC and HAP limits have been added by reference. The records required are spelled out in Section E.1.5.

- (v) Section D.911 Facility Description

Facility Description [326 IAC 2-8-4(10)]

A woodworking shop located in plant 9, using a cyclone and a baghouse for control. **The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.**

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

Reason revised: The design of the control system and the type of woodworking equipment were added based the changes to 326 IAC 6-3. The addition information pertains to the applicability. No physical or operational modification has been done to the units. The statement of the non-enforceability has been added to clearly state that fact. Condition A.3 has been changed to match this description.

- (w) Condition D.911.1 Particulate Matter (~~PM~~) Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitation for Manufacturing Processes**), the allowable ~~PM~~ **particulate** emission rate from the woodworking ~~facilities~~ **shop** shall not exceed 1.51 pounds per hour when operating at a process weight rate of 453 pounds per hour.

The pounds per hour limitation was calculated ~~with using~~ **with using** the following equation: Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Reason revised: The condition has been updated to match the new rule language.

- (x) **Condition D.911.43 Particulate Control Pursuant to T 039-6434-00407, issued on December 22, 1998, and in order to comply with D.11.1, The cyclone and baghouse for PM particulate control shall be in operation at all times when the wood working facilities are in operation and exhausting to the outside atmosphere and control emissions from woodworking shop at all times that the woodworking shop is in operation.**

Reason revised: The conditions has been updated to match the new rule language in 326 IAC 6-3. The exhausting to the outside atmosphere has been removed, since the statement is contrary to 326 IAC 6-3. While in some instances IDEM has lessened the monitoring required for a control device if it vents indoors, if the control device is need to meet the limit, then the control device must operate regardless were it vents to.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) Condition B.14 Permit Shield
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

Reason not incorporated: The original permit was a Title V permit which does contain a permit shield. The Permittee has chosen to transition to a FESOP permit. The FESOP permits issued by IDEM do not contain permit shields. Therefore, the condition has been removed.

- (b) **B.15 Multiple Exceedances**  
Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

Reason not incorporated: This condition has been removed because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

- (c) **B.27 Enhanced New Source Review**  
The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

Reason not incorporated: This permit is a Transition. There are no unpermitted facilities or facilities to be constructed. The original Title V was also a construction permit for the unpermitted, at that time, units; Chassis Prep, Chassis Prep, sidewall lamination, baggage door assembly, and floor lamination.

- (d) **D.1.3 Volatile Organic Compounds (VOC)**  
Any change or modification which may increase the potential VOC emissions to 25 tons per year per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Reason not incorporated: This condition does not apply to this unit since the unit is subject to 326 IAC 8-2-9. This condition would keep units otherwise subject to 326 IAC 8-1-6 from the requirements of that rule. Since the unit is subject to 326 IAC 8-2-9 it is not subject to 326 IAC 8-1-6. AA 039-12393-00407 addresses this removal; however, the pages issued still contained the limit.

(e) D.1.4 Testing Requirements

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

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

(f) Condition D.2.3 Testing Requirements

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

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

(g) D.3.1 Particulate Matter (PM)

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Reason not incorporated: The coating method is now flow. Since flow coating does not generate particulate matter, facility is not subject to 40 CFR 52 Subpart P or 326 IAC 6-3. The window router still is subject and the condition is in section D.12. No units in this section are subject to 40 CFR 52 Subpart P or 326 IAC 6-3.

(h) D.3.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions to 15 pounds per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Reason not incorporated: The source has decided to have this condition removed and have this facility subject to 326 IAC 8-2-9. The requirement of 326 IAC 8-2-9 are in the new conditions D.3.1 and D.3.2.

(i) Condition D.3.3 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the

PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

(j) Condition D.4.2 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

(k) D.5.2 Particulate Matter (PM)

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Reason not incorporated: The coating method is now flow and hand. Since flow and hand coating do not generate particulate matter, facility is not subject to 40 CFR 52 Subpart P or 326 IAC 6-3.

(l) D.5.3 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions to 25 tons per year per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Reason not incorporated: This condition does not apply to this unit since the unit is subject to 326 IAC 8-2-9. This condition would keep units otherwise subject to 326 IAC 8-1-6 from the requirements of that rule. Since the unit is subject to 326 8-2-9 it is not subject to 326 IAC 8-1-6.

(m) Condition D.5.4 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

- (n) Condition D.5.6 Monitoring
  - (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason not incorporated: This condition was required to ensure compliance with the particulate limit. Since the facility no longer generates particulate, the monitoring is not necessary. Therefore, the condition is removed.

(o) **SECTION D.6 FACILITY OPERATION CONDITIONS**

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

- (a) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting to stack P1.

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

- D.6.1 Particulate Matter (PM) [326 IAC 6-3]  
Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each woodworking facility shall not exceed 1.6 pounds per hour when operating at a process weight rate of 497.38 pounds per hour.

The pounds per hour limitation was calculated with the following equation:  
Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]  
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

- D.6.3 Testing Requirements [326 IAC 2-7-6(1)(6)]  
The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is

required by IDEM, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.6.4 Particulate Matter (PM)**

The cyclone and baghouse for PM control shall be in operation at all times when the wood working facilities are in operation and exhausting to the outside atmosphere.

Reason not incorporated: This woodworking shop is no longer subject to 326 IAC 6-3, due to the rule change. Therefore, this entire section has been removed. The rule change has not been revised in Indiana's SIP. Therefore, the unit is subject to 40 CFR 52 Subpart P. The woodworking shop and all the other units subject only to 40 CFR 52 Subpart P are now listed in section D.12, which contains the condition limiting the units by 40 CFR 52 Subpart P.

(p) **SECTION D.7 FACILITY OPERATION CONDITIONS**

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

(c) Four (4) metal inert gas, type of wire used ER5154, maximum hourly consumption of wire per station is 2.8 and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.

(d) Four (4) metal inert gas, type of wire used ER5154, maximum hourly consumption of wire per station is 0.5625 and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.

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

**D.7.1 Particulate Matter (PM) [326 IAC 6-3]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding facilities shall not exceed allowable PM emission rate based on the following equation:

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

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

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

**D.7.2 Testing Requirements [326 IAC 2-7-6(1)(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: The welders and cutters are no longer subject to 326 IAC 6-3, due to the rule change. Therefore, this entire section has been removed.

The rule change has not been revised in Indiana's SIP. Therefore, the units are subject to 40 CFR 52 Subpart P. The welders, cutters, and all the other units subject only to 40 CFR 52 Subpart P are now listed in section D.12, which contains the condition limiting the units by 40 CFR 52 Subpart P.

(q) Condition D.8.5 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.8.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for any of the facilities previously in Section D.8 is unnecessary.

(r) Condition D.9.3 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP Transition 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 administratively complete Part 70 Renewal application for the purposes of renewal was received on January 27, 2003. A letter requesting the Part 70 Renewal be processed as a Transition to a FESOP instead was received July 15, 2003. Additional information was received on March 31, 2003; June 4, 2003; June 9, 2003; June 24, 2003; and August 28, 2003.

A notice of completeness letter was mailed to the source on April 22, 2003.

### **Emission Calculations**

See Appendix A, pages 1 through 8, of this document for detailed emissions calculations. See Appendix B, pages 1 through 7, of this document for the TANKS printouts for the diesel and gasoline tanks.



**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous TV.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	<100
PM-10	<100
SO <sub>2</sub>	<100
VOC	>100 and <250
CO	<100
NO <sub>x</sub>	<100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Xylene	<10
Toluene	<10
Methyl Ethyl Ketone	<10
Ethyl Benzene	<10
Hexane	<10
MDI	<10
Polycyclic Organic Matter	<10
Fine Mineral Fibers	<10
Methanol	<10
Methyl Isobutyl Ketone	<10
TOTAL	>25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Potential to Emit After Issuance**

The source, issued a Title V on December 22, 1998, has opted to become a FESOP source, rather than renew its Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units,

the source's potential to emit is based on the emission units included in the original Title V. (T 039-6434-00407 issued on December 22, 1998)

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Chassis Prep Frame Coating	0.4	0.4	-	<99.4	-	-	<9.93/24.92
Chassis Prep Assembly	0.2	0.2	-		-	-	
Sidewall and Roof Lamination	-	-	-		-	-	
Baggage Door Assembly	-	-	-		-	-	
Floor Lamination	-	-	-		-	-	
Wood Furniture Coating	-	-	-		-	-	
Plant 9 Assembly	1.8	1.8	-		-	-	
Undercoating	0.08	0.08	-		-	-	
Final Cleaning Operation	-	-	-		-	-	
Touch Up and Repair	0.12	0.12	-		-	-	
Gasoline Fuel Transfer and Dispensing	-	-	-	0.1	-	-	0.03/0.04
Petroleum Fuel Dispensing	-	-	-	0.3	-	-	0.01/0.01
Plant 1 Woodworking Shop	Neg.	Neg.	-	-	-	-	-
Plant 2 Woodworking Equipment	Neg.	Neg.	-	-	-	-	-
Window Routers	Neg.	Neg.	-	-	-	-	-
Plant 3 Woodworking Equipment	Neg.	Neg.	-	-	-	-	-
Plant 9 Woodworking Shop	3.5	3.5	-	-	-	-	-
Metal Welding and Cutting	1.5	1.5	-	-	-	-	0.02/0.02
Roads and Parking Lots	<5	<5	-	-	-	-	-
Natural Gas Combustion	0.1	0.3	Neg.	0.2	4	4	0.01/0.01
Total PTE After Issuance	<12.7	<12.9	Neg.	<100	4	4	<10/<25

The first number in the HAPs column is for any single HAP. The second number is for the combination of all HAPs.

Chassis Prep Frame Coating, Undercoating, and Plant 9 Woodworking are the only facilities with limited emissions for PM and PM10. Without the limits on PM and PM10 Potential Emissions from these facilities, the source would still be below Title V levels.

The VOC and HAPs potential are based the limits on Chassis Prep Frame Coating, Chassis Prep Assembly, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, Wood Furniture Coating, Plant 9 Assembly, Undercoating, Final Cleaning Operations, and Touch Up and Repair, which are created is this FESOP. The limit for any single HAP was set by subtracting the highest potential emissions of any single HAP for each remaining facility from the major level of 10 tons per year. Each single HAP must be emitted in quantities less than the determined value. While this limit is more restrictive than one hundred eighty-eight individual limits with each based on the remaining facilities potential emissions, this limit is simpler.

All potential emissions for Natural Gas Combustion are based a total maximum capacity of ten (10) MMBtu per hour for all units.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment, maintenance attainment or unclassifiable
SO <sub>2</sub>	attainment, maintenance attainment or unclassifiable
NO <sub>2</sub>	attainment, maintenance attainment or unclassifiable
Ozone	attainment, maintenance attainment or unclassifiable
CO	attainment, maintenance attainment or unclassifiable
Lead	attainment, maintenance attainment or unclassifiable

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.

### Federal Rule Applicability

As a result of rule additions and source status change, the following rule applicabilities have changed or are new:

- (a) This source is not subject to the requirements of the New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60), Subpart Kb as there are no Volatile Organic Liquid Storage Vessels with a capacity greater than forty (40) cubic meters. This source is not subject to the requirements of NSPS, Subpart XX as there is no bulk gasoline terminal at the source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart R, Subpart JJ, Subpart EEEE, Subpart MMMM, or Subpart PPPP (all of 40 CFR Part 63) due to the source being a synthetic minor source of HAPs. The synthetic minor source status is created by the limits in this permit.

The source is not subject to any other NESHAPs.

- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are no longer applicable to this source because the source is no longer a major source of hazardous air pollutant (HAP) emissions (i.e., the source has the potential to emit less than 10 tons per year of a single HAP or less than 25 tons per year or greater of a combination of HAPs). The source is a synthetic minor source of HAPs. The synthetic minor source status is created by the limits in this permit.

#### **State Rule Applicability - Entire Source**

##### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not required to submit an Emergency Reduction Plan.

##### 326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) If required by specific condition(s) in Section D of the permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

##### 326 IAC 1-7-3 (a) (Actual Stack Height Provisions)

The current stacks at the source are not subject to the provisions of 326 IAC 1-7-3 (a), since each stack has less than twenty-five (25) tons per year of potential emissions of PM and SO<sub>2</sub>.

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

The total source potential emissions of all criteria pollutants are less than 250 tons per year. The source is not one of the 28 listed sources. The source was constructed between August 1977 and January 1984. The source has not conducted any modifications to trigger PSD and is currently considered a minor PSD source. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart county. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

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

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-1-6 (New Facilities General reduction requirements) the coating facilities; Chassis Prep Assembly, Baggage Door Assembly, Plant 9 Assembly, and Final Cleaning Operations; are exempt from this rule because the potential VOC emissions from each were and will be limited to less than 25 tons per year.

Touch Up and Repair, Gasoline Fuel Transfer and Dispensing, and Petroleum Fuel Dispensing are not subject to 326 IAC 8-1-6 as each unit's potential VOC emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

Pursuant to T 039-6434-00407, issued on December 22, 1998; coating booths, Chassis Prep Frame Coating and Undercoating, and the coating facility, Floor Lamination, shall be limited by the following. Pursuant to 326 IAC 8-2-9; the coating facility, Sidewall and Roof Lamination, shall be limited by the following.

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to miscellaneous metal parts or products shall be limited to:
  - (1) Three and a half (3.5) pounds of VOC/gallon of coating less water delivered to the applicator for the Chassis Prep Frame Coating and Undercoating booths. Both of these booths only apply extreme performance coatings.
  - (2) Three (3.0) pounds of VOC/gallon of coating less water delivered to the applicator for the Sidewall and Roof Lamination and Floor Lamination. Both of these facilities only apply other coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as

such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the coating booths are in compliance with this requirement.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

Pursuant to T 039-6434-00407, issued on December 22, 1998, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Wood Furniture coating (located at plant 9) applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

Heat Set Strips Application is accepted alternative method of application for Roller Coating. Heat Set Strips is the technology used to apply coating (adhesive) to substrate by having the coating already applied to a web. The web is placed between the two substrates and heat is applied. The heat causes the coating to bond with the substrate.

The coating facilities, Chassis Prep assembly, Baggage Door Assembly and Plant 9 Assembly, are exempt from this rule because the products produced are not considered wood furniture.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The Gasoline Fuel Transfer and Dispensing are not subject to this rule as it was installed prior to July 1, 1989.

As a result of rule changes the following rule applicabilities have changed or are new:

40 CFR 52 Subpart P (Indiana SIP)

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the coating operations; Chassis Prep Frame Coating, Chassis Prep Assembly, Wood Furniture Coating, Plant 9 Assembly, Undercoating, and Touch Up and Repair; the woodworking operations; Plant 1 Woodworking shop, Plant 2 Woodworking equipment, Window Routers, Plant 3 Woodworking equipment, and Plant 9 Woodworking Shop; and all metal welding and cutting shall be limited by the following:

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

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

The Permittee has switched Sidewall and Roof Lamination and Floor lamination to flow and hand coating. These operations no longer generate any PM. Therefore, these operations are not subject to this limitation.

Baggage Door Assembly and Final Cleaning do not generate any PM. Therefore, these operations are not subject to this limitation.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations, Chassis Prep Frame Coating and Undercoating, shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

The coating operations, Sidewall and Roof Lamination, Baggage Door Assembly, Floor Lamination, are not subject as they all use flow coating and hand coating.

The coating operations, Chassis Prep Assembly, Plant 9 Assembly, Final Cleaning, Wood Furniture Coating, and Touch Up and Repair, are not subject as their potential emissions are less than five hundred fifty-one thousandths (0.551) pounds per hour. The Final Cleaning does not generate any PM.

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

Pursuant to T 039-6-434-00047, issued on December 22, 1998, the particulate matter (PM) from the Plant 9 Woodworking shop shall each be limited by the following:

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

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

The baghouse shall be in operation at all times the Plant 9 Woodworking shop is in operation, in order to comply with this limit.

Pursuant to 326 IAC 6-3-2, the woodworking operations; Plant 1 Woodworking shop, Plant 2 Woodworking equipment, and Plant 3 Woodworking equipment; are not subject as their potential emissions are less than five hundred fifty-one thousandths (0.551) pounds per hour.

The woodworking operations, Window Routers, are not subject as they are trivial activities.

All metal welding operations are not subject as each group uses less than six hundred twenty-five (625) pounds of rod or wire per day.

All metal cutting operation are not subject as each group cuts less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness.

## **Compliance Requirements**

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

All compliance requirements from previous approvals were incorporated into this FESOP except the following:

Condition D.5.6 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason not incorporated: This condition was required to ensure compliance with the particulate limit. Since the facility no longer generates particulate, the monitoring is not necessary. Therefore, the condition is removed.

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

- (a) The Chassis Prep Frame Coating has applicable compliance monitoring conditions as specified below:
  - (1) Weekly 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 coating booth stack E4 while the booth is 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 deviation from this permit.
  - (2) 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 deviation from this permit.

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

These monitoring conditions are necessary because the filters for the Chassis Prep Frame Coating must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

- (b) The Undercoating has applicable compliance monitoring conditions as specified below:

- (1) Weekly 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 coating booth stack E3 while the booth is 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 deviation from this permit.

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

These monitoring conditions are necessary because the filters for the Undercoating must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

## **Conclusion**

The operation of this stationary motor home manufacturing operation shall be subject to the conditions of the attached proposed FESOP No.: F039-17521-00407.

**Indiana Department of Environmental Management  
Office of Air Quality**

Appendix A Emission Calculations  
Pages 1 to 8  
to the  
Technical Support Document (TSD) for a Federally Enforceable State  
Operating Permit (FESOP) Transition

**Source Name:** Damon Corporation Plts. 1, 2, 3, and 9  
**Source Location:** 52570 Paul and 2929 Gateway Drive, Elkhart, IN 46514  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** F039-17521-00407  
**Permit Reviewer:** Jed D. Wolkins

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

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 6/16/2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit) *	Maximum (unit/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 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Chasis Prep Frame Coating</b>																
Black A.D. Enamel 5-00471	11.7	29.90%	0.0%	29.9%	0.0%		2.11000	1.500	3.49	3.49	7.37	176.85	32.28	18.92	#DIV/0!	75%
0217b Black Primer	9.0	28.00%	0.0%	28.0%	0.0%		0.03200	1.500	2.52	2.52	0.12	2.91	0.53	0.34	#DIV/0!	75%
Mineral Spirits	6.5	100.00%	0.0%	100.0%	0.0%		0.02769	1.500	6.51	6.51	0.27	6.49	1.18	0.00	#DIV/0!	100%
<b>Chasis Prep Assembly</b>																
Geocel Z300	7.8	36.70%	0.0%	36.7%	0.0%		1.22000	1.500	2.85	2.85	5.21	125.08	22.83	0.00	#DIV/0!	100%
Oatey PVC Cement	7.3	75.00%	0.0%	75.0%	0.0%		0.00250	1.500	5.45	5.45	0.02	0.49	0.09	0.00	#DIV/0!	100%
Oteyclean	6.6	100.00%	0.0%	100.0%	0.0%		0.00250	1.500	6.62	6.62	0.02	0.60	0.11	0.00	#DIV/0!	100%
Enerfoam	10.0	0.00%	0.0%	0.0%	0.0%		0.01250	1.500	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	100%
Enerfoam Cleaner	8.0	95.80%	0.0%	95.8%	0.0%		0.00930	1.500	7.65	7.65	0.11	2.56	0.47	0.00	#DIV/0!	100%
Bostk Supertac low voc	5.7	90.00%	0.0%	90.0%	0.0%		0.20000	1.500	5.13	5.13	1.54	36.94	6.74	0.19	#DIV/0!	75%
Insulating Varnish	6.4	64.00%	0.0%	64.0%	0.0%		0.00650	1.500	4.10	4.10	0.04	0.96	0.18	0.02	#DIV/0!	75%
<b>Sidewall and Roof Lamination</b>																
SIA 332G	7.6	1.00%	0.0%	1.0%	0.0%		0.219	1.500	0.08	0.08	0.02	0.60	0.11	0.00	#DIV/0!	100%
SIA 171-30 W	12.0	0.00%	0.0%	0.0%	0.0%		0.656	1.500	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	100%
SIA 113 shv34	8.9	0.00%	0.0%	0.0%	0.0%		111.110	1.500	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	100%
Geocel 3300	11.4	7.80%	0.0%	7.8%	0.0%		0.300	1.500	0.89	0.89	0.40	9.56	1.74	0.00	#DIV/0!	100%
<b>Baggage Door Assembly</b>																
StainMatch Sealant	13.3	2.00%	0.0%	2.0%	0.0%		0.25000	1.500	0.27	0.27	0.10	2.40	0.44	0.00	#DIV/0!	100%
Orange Cleaner	6.9	100.00%	20.0%	80.0%	16.5%		0.02000	1.500	6.59	5.50	0.17	3.96	0.72	0.00	#DIV/0!	100%
<b>Floor Lamination</b>																
SIA 340G	7.5	1.00%	0.0%	1.0%	0.0%		0.889	1.500	0.07	0.07	0.10	2.40	0.44	0.00	#DIV/0!	100%
Orange Cleaner	6.9	100.00%	20.0%	80.0%	16.5%		0.02000	1.500	6.59	5.50	0.17	3.96	0.72	0.00	#DIV/0!	100%
SIA Urethane Adhesive	9.2	0.00%	0.0%	0.0%	0.0%		12.56000	1.500	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	100%
Geocel 3300	11.4	7.80%	0.0%	7.8%	0.0%		0.32500	1.500	0.89	0.89	0.43	10.36	1.89	0.00	#DIV/0!	100%

State Potential Emissions

Add worst case coating to all solvents

16.09 386.11 70.47 19.47

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/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: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 6/16/2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit) *	Maximum (unit/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 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Wood Furniture Coating</b>																
SM 7108 Permathane	12.8	5.00%	0.0%	5.0%	0.0%		0.05900	1.500	0.64	0.64	0.06	1.35	0.25	0.00	#DIV/0!	100%
<b>Undercoating</b>																
Z-TEK Undercoat	10.4	40.70%	39.0%	1.7%	48.7%		1.00000	1.500	0.34	0.18	0.27	6.36	1.16	4.05	#DIV/0!	90%
<b>Plant 9 Assembly</b>																
Imperial Whisper Spray 514 adhesive	6.9	68.00%	0.0%	68.0%	0.0%		0.42100	1.500	4.69	4.69	2.96	71.11	12.98	1.53	#DIV/0!	75%
Sikaflex 252 Sealer	9.8	6.50%	0.0%	6.5%	0.0%		0.10690	1.500	0.64	0.64	0.10	2.45	0.45	0.00	#DIV/0!	100%
Dicor LS 502 LSW Sealer	9.9	30.70%	0.0%	30.7%	0.0%		1.11500	1.500	3.04	3.04	5.09	122.15	22.29	0.00	#DIV/0!	100%
Colormetric Sealer	10.0	20.00%	0.0%	20.0%	0.0%		0.00100	1.500	2.00	2.00	0.00	0.07	0.01	0.00	#DIV/0!	100%
Oatey Cleaner	6.6	100.00%	0.0%	100.0%	0.0%		0.01500	1.500	6.62	6.62	0.15	3.57	0.65	0.00	#DIV/0!	100%
Oatey PVC Cement	7.3	75.00%	0.0%	75.0%	0.0%		0.01300	1.500	5.45	5.45	0.11	2.55	0.47	0.00	#DIV/0!	100%
CM 911 orange cleaner	6.9	100.00%	20.0%	80.0%	16.5%		0.16000	1.500	6.59	5.50	1.32	31.70	5.79	0.00	#DIV/0!	100%
Bostic Supertac Low VOC Aerosol	5.7	90.00%	0.0%	90.0%	0.0%		0.08100	1.500	5.13	5.13	0.62	14.96	2.73	0.08	#DIV/0!	75%
Brake Clean Aerosol	6.4	100.00%	0.0%	100.0%	0.0%		0.03300	1.500	6.35	6.35	0.31	7.54	1.38	0.00	#DIV/0!	75%
Spray & Go Aerosol Enamel	6.7	80.00%	0.0%	80.0%	0.0%		0.08300	1.500	5.33	5.33	0.66	15.92	2.91	0.18	#DIV/0!	75%
<b>Touch-Up and Repair</b>																
Kardol 105151 Thinner	7.1	75.00%	0.0%	75.0%	0.0%		0.02540	1.500	5.35	5.35	0.20	4.89	0.89	0.00	#DIV/0!	100%
Sherlac Touch-up Paint Basecoat	7.4	77.40%	0.0%	77.4%	0.0%		0.01052	1.500	5.72	5.72	0.09	2.17	0.40	0.03	#DIV/0!	75%
Valspar Clearcoat K2-C42	7.4	51.10%	0.0%	51.1%	0.0%		0.01270	1.500	3.78	3.78	0.07	1.73	0.32	0.08	#DIV/0!	75%
Valspar K2 Activator	8.2	60.80%	0.0%	60.8%	0.0%		0.00315	1.500	4.96	4.96	0.02	0.56	0.10	0.02	#DIV/0!	75%
Mineral Spirits	6.5	100.00%	0.0%	100.0%	0.0%		0.02700	1.500	6.47	6.47	0.26	6.29	1.15	0.00	#DIV/0!	100%
<b>Final</b>																
Pledge Furniture Polish	7.4	100.00%	30.0%	70.0%	26.7%		0.07800	1.500	7.06	5.18	0.61	14.55	2.65	0.00	#DIV/0!	75%
Cyclo Glass Clean	8.3	100.00%	77.0%	23.0%	77.0%		0.03900	1.500	8.33	1.92	0.11	2.69	0.49	0.00	#DIV/0!	75%
Isopropyl Alcohol	6.6	100.00%	0.0%	100.0%	0.0%		0.27700	2.490	6.58	6.58	4.54	108.92	19.88	0.00	#DIV/0!	100%

**State Potential Emissions** Add worst case coating to all solvents **17.56 421.55 76.93 5.96**

**Total of Both Pages State Potential Emissions** Add worst case coating to all solvents **33.65 807.66 147.40 25.43**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/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: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 4/23/2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % 4-4' Methylene diphenyl Diisocyanate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	4-4' Methylene diphenyl Diisocyanate Emissions (ton/yr)
Red Sealer Terminal Varnish	6.4	0.006500	1.50	18.00%	17.00%	0.00%	0.00%	0.00%	0.00%	0.05	0.05	0.00	0.00	0.00	0.00
Geocel 3300 Sealant	11.3	0.981000	1.50	10.00%	0.00%	0.00%	1.50%	0.00%	1.00%	7.28	0.00	0.00	1.09	0.00	0.73
Oatey PVC Cement	7.3	0.015500	1.50	0.00%	0.00%	75.00%	0.00%	0.00%	0.00%	0.00	0.00	0.55	0.00	0.00	0.00
Oateyclean	6.6	0.002500	1.50	0.00%	0.00%	80.00%	0.00%	0.00%	0.00%	0.00	0.00	0.09	0.00	0.00	0.00
Bostik Supertac Low VOC	5.7	0.281000	1.50	0.00%	0.00%	0.00%	0.00%	13.00%	0.00%	0.00	0.00	0.00	0.00	1.37	0.00
SM 7108 Permathane	12.8	0.059000	1.50	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.15	0.00	0.00	0.00	0.00
SikaFLEX 252	9.8	0.106900	1.50	5.00%	0.00%	0.00%	0.00%	0.00%	0.70%	0.34	0.00	0.00	0.00	0.00	0.05
Kardol 155151	7.1	0.025400	1.50	25.00%	65.00%	0.00%	0.00%	0.00%	0.00%	0.30	0.77	0.00	0.00	0.00	0.00
Valspar touch-up Clearcoat	7.4	0.012700	1.50	0.00%	0.00%	5.30%	0.00%	0.00%	0.00%	0.00	0.00	0.03	0.00	0.00	0.00
Valspar K2 Activator	8.2	0.003170	1.50	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Spray & Go Aerosol Paint	6.7	0.083000	1.50	5.00%	32.00%	10.00%	0.00%	0.00%	0.00%	0.18	1.17	0.37	0.00	0.00	0.00
SIA 171-30	12.0	0.656000	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	5.15
SIA 340	7.5	0.888800	1.50	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.44	0.00	0.00	0.00	0.00	0.00
SIA 332	7.6	0.219200	1.50	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.11	0.00	0.00	0.00	0.00	0.00
ZPG-9902S	10.4	1.000000	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Sher-lac Mixing Colors	7.4	0.010520	1.50	0.00%	30.00%	16.00%	0.00%	0.00%	0.00%	0.00	0.15	0.08	0.00	0.00	0.00
Enerfoam	10.010000	0.01250	1.500	0.00%	0.00%	0.00%	0.00%	0.00%	60.00%	0.00	0.00	0.00	0.00	0.00	0.49

Total State Potential Emissions

**8.70      2.29      1.12      1.09      1.37      6.42**

METHODOLOGY

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

Appendix A: Emission Calculations  
HAP Emission Calculations

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 4/23/2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Polycyclic Organic Matter	Weight % Methanol	Weight % Fine Mineral Fibers	Weight % Methylene Chloride	Weight % Methyl Isobutyl Ketone	Polycyclic Organic Matter Emissions (ton/yr)	Methanol Emissions (ton/yr)	Fine Mineral Fibers Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Transfer Efficiency
Red Sealer Terminal Varnish	6.4	0.006500	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
Geocel 3300 Sealant	11.3	0.981000	1.50	1.00%	0.00%	0.00%	0.00%	0.00%	0.73	0.00	0.00	0.00	0.00	
Oatey PVC Cement	7.3	0.015500	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
Oateyclean	6.6	0.002500	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
Bostik Supertac Low VOC	5.7	0.281000	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
SM 7108 Permathane	12.8	0.059000	1.50	0.05%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
SikaFLEX 252	9.8	0.106900	1.50	0.70%	0.00%	0.00%	0.00%	0.00%	0.05	0.00	0.00	0.00	0.00	
Kardol 155151	7.1	0.025400	1.50	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.30	0.00	0.00	0.00	
Valspar touch-up Clearcoat	7.4	0.012700	1.50	0.00%	0.00%	0.00%	0.00%	5.20%	0.00	0.00	0.00	0.00	0.03	
Valspar K2 Activator	8.2	0.003170	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
Spray & Go Aerosol Paint	6.7	0.083000	1.50	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.09	0.00	0.00	75%
SIA 171-30	12.0	0.656000	1.50	10.00%	0.00%	45.00%	0.00%	0.00%	5.15	0.00	0.00	0.00	0.00	100%
SIA 340	7.5	0.888800	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
SIA 332	7.6	0.219200	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	
ZPG-9902S	10.4	1.000000	1.50	0.00%	0.00%	35.00%	0.00%	0.00%	0.00	0.00	1.20	0.00	0.00	95%
Sher-lac Mixing Colors	7.4	0.010520	1.50	0.00%	0.00%	0.00%	0.00%	25.00%	0.00	0.00	0.00	0.00	0.13	
Enerfoam	10.010000	0.01250	1.500	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.01	0.00	

Total State Potential Emissions

8.70 2.29 1.12 1.09 1.37

METHODOLOGY

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

Fine Mineral Fibers emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* (1 - transfer efficiency/100) \* 8760 hrs/yr \* 1 ton/2000 lbs

Appendix A: Emissions Calculations  
Welding and Thermal Cutting

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 4/23/2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(E70S-3)	14	0.8571		0.0051	0.0003			0.06119694	0.00359982	0	0	0.00359982
Metal Inert Gas (MIG)(ER5356)	4	0.6675		0.07233				0.1931211	0	0	0	0
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1	0.375	12	0.0039				0.002808	0	0	0	0
Plasma**	1	0.25	6	0.0039				0.001404	0	0	0	0
<b>EMISSION TOTALS</b>												
								<b>PM = PM10</b>	<b>Mn</b>	<b>Ni</b>	<b>Cr</b>	<b>HAPS</b>
Potential Emissions lbs/hr								0.25853004	0.00359982	0	0	0.00359982
Potential Emissions lbs/day								6.20472096	0.08639568	0	0	0.08639568
Potential Emissions tons/year								<b>1.13236158</b>	<b>0.01576721</b>	<b>0</b>	<b>0</b>	<b>0.01576721</b>

METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
TV: 039-17521-00407  
Reviewer: Jed D. Wolkins  
Date: 7/18/2003

Unit	Grain loading (gr/acf)	Flow (acf/min)	Sawdust Collected (lbs/hr)	Control Efficiency	Limited Potential PM Emissions (tons/year)	Limited Potential PM10 Emissions (tons/year)	Unrestricted Potential PM Emissions (tons/year)	Unrestricted Potential PM10 Emissions (tons/year)
Plant 1 Woodworking Portable Collector			0.011	99.0%	0.0482	0.0482	0.0482	0.0482
Window Routers			0.011	0.0%	0.0482	0.0482	0.0482	0.0482
Plant 2 Woodworking Portable Collector			0.011	99.0%	0.0482	0.0482	0.0482	0.0482
Plant 3 Woodworking Portable Collector 1			0.011	99.0%	0.0482	0.0482	0.0482	0.0482
Plant 3 Woodworking Portable Collector 2			0.011	99.0%	0.0482	0.0482	0.0482	0.0482
Plant 9 Woodworking Shop	0.020	4650.000		99.0%	3.49	3.49	349.15	349.15

**State Potential Emissions**

**3.73      3.73      349.39      349.39**

**METHODOLOGY**

Grain loading is the grain loading after the control device. For the Plant 9 Woodworking Shop, the control efficiency is included, since the control device operation is practically enforceable.

Limited Potential PM Emissions for Plant 9 Woodworking Shop = Grain loading (gr/acf) \* Airflow (acf/min) \* 60 min/hr \* 8760 hours/year \* lb/7000 gr \* 1 ton/2000 lb.

Unrestricted Potential PM Emissions fro Plant 9 Woodworking Shop = Grain loading (gr/acf) \* Airflow (acf/min) (1/(1- Control Efficiency/100)) \* 60 min/hr \* lb/7000 gr.

For the other units:

Limited Potential PM Emissions = Sawdust Collected (lb/hr) \* (1/Control Efficiency/100) \* 8760 hr/yr \* 1 ton/2000 lb.

Unrestricted Potential PM Emissions = Sawdust Collected (lb/hr) \* (1/Control Efficiency/100) \* 8760 hr/yr \* 1 ton/2000 lb.

Since the routers are uncontrolled and their operational and physical design are less than the woodworking equipment, the Potential Emission of the other unit is used for the Window Routers. PM is assumed to equal PM10.



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

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
 Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
 TV: 039-17521-00407  
 Reviewer: Jed D. Wolkins  
 Date: 10/27/2003

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

10

87.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.3	0.0	4.4	0.2	3.7

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable 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 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

HAPs Emissions

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
 Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
 TV: 039-17521-00407  
 Reviewer: Jed D. Wolkins  
 Date: 10/27/2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.00009198	0.00005256	0.003285	0.07884	0.00014892

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021
Potential Emission in tons/yr	0.00002	0.00005	0.00006	0.00002	0.00009

Methodology is the same as page 1.

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

**TANKS 4.0**  
**Emissions Report - Summary Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	Damon Diesel Tank
City:	Elkhart
State:	Indiana
Company:	Damon
Type of Tank:	Horizontal Tank
Description:	Diesel tank for filling RV's

**Tank Dimensions**

Shell Length (ft):	6.00
Diameter (ft):	3.83
Volume (gallons):	500.00
Turnovers:	10.00
Net Throughput (gal/yr):	5,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	Red/Primer
Shell Condition:	Good

**Breather Vent Settings**

Vacuum Settings (psig):	0.00
Pressure Settings (psig):	0.00

Meteorological Data used in Emissions Calculations: South Bend, Indiana (Avg Atmospheric Pressure = 14.33 psia)

## TANKS 4.0 Emissions Report - Summary Format Liquid Contents of Storage Tank

Mixture/Component	Month	Daily Liquid Surf. Temperatures (deg F)			Liquid Bulk Temp. (deg F)	Vapor Pressures (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Distillate fuel oil no. 2	All	60.41	49.68	71.14	53.86	0.0066	0.0046	0.0093	130.0000			188.00	Option 5: A=12.101, B=8907 Option 2: A=7.04383, B=1573.267, C=208.56
1,2,4-Trimethylbenzene						0.0208	0.0134	0.0315	120.1900	0.0100	0.0457	120.19	
Benzene						1.1812	0.8709	1.5782	78.1100	0.0000	0.0021	78.11	Option 2: A=6.905, B=1211.033, C=220.79
Ethylbenzene						0.1101	0.0751	0.1583	106.1700	0.0001	0.0032	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Hexane (-n)						1.9339	1.4531	2.5382	86.1700	0.0000	0.0004	86.17	Option 2: A=6.876, B=1171.17, C=224.41
Toluene						0.3344	0.2375	0.4629	92.1300	0.0003	0.0236	92.13	Option 2: A=6.954, B=1344.8, C=219.48
Unidentified Components						0.0056	0.0049	0.0051	134.4777	0.9866	0.8666	189.60	
Xylene (-m)						0.0917	0.0623	0.1323	106.1700	0.0029	0.0585	106.17	Option 2: A=7.009, B=1462.266, C=215.11

### TANKS 4.0 Emissions Report - Summary Format Individual Tank Emission Totals

#### Annual Emissions Report

Components	Losses (lbs)		Total Emissions
	Working Loss	Breathing Loss	
Distillate fuel oil no. 2	0.10	0.20	0.31
Hexane (-n)	0.00	0.00	0.00
Benzene	0.00	0.00	0.00
Toluene	0.00	0.00	0.01
Ethylbenzene	0.00	0.00	0.00
Xylene (-m)	0.01	0.01	0.02
1,2,4-Trimethylbenzene	0.00	0.01	0.01
Unidentified Components	0.09	0.18	0.26

**TANKS 4.0**  
**Emissions Report - Summary Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	Damon Gasoline Tank
City:	Elkhart
State:	Indiana
Company:	Damon
Type of Tank:	Horizontal Tank
Description:	Gas tank for filling RV's

**Tank Dimensions**

Shell Length (ft):	12.00
Diameter (ft):	3.83
Volume (gallons):	1,000.00
Turnovers:	30.00
Net Throughput (gal/yr):	30,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	Red/Primer
Shell Condition:	Good

**Breather Vent Settings**

Vacuum Settings (psig):	-1.00
Pressure Settings (psig):	1.00

Meteorological Data used in Emissions Calculations: South Bend, Indiana (Avg Atmospheric Pressure = 14.33 psia)

### TANKS 4.0 Emissions Report - Summary Format Liquid Contents of Storage Tank

Mixture/Component	Month	Daily Liquid Surf. Temperatures (deg F)			Liquid Bulk Temp. (deg F)	Vapor Pressures (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Gasoline (RVP 13)	All	60.41	49.68	71.14	53.86	7.0004	5.7066	8.5168	62.0000			92.00	Option 4: RVP=13, ASTM Slope=3
1,2,4-Trimethylbenzene						0.0208	0.0134	0.0315	120.1900	0.0250	0.0001	120.19	Option 2: A=7.04383, B=1573.267, C=208.56
Benzene						1.1812	0.8709	1.5782	78.1100	0.0180	0.0045	78.11	Option 2: A=6.905, B=1211.033, C=220.79
Cyclohexane						1.2249	0.9096	1.6257	84.1600	0.0024	0.0006	84.16	Option 2: A=6.841, B=1201.53, C=222.65
Ethylbenzene						0.1101	0.0751	0.1583	106.1700	0.0140	0.0003	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Hexane (-n)						1.9339	1.4531	2.5382	86.1700	0.0100	0.0041	86.17	Option 2: A=6.876, B=1171.17, C=224.41
Isooctane						0.5895	0.3814	0.8441	114.2200	0.0400	0.0050	114.22	Option 1: VP60 = .58 VP70 = .812
Isopropyl benzene						0.0519	0.0344	0.0767	120.2000	0.0050	0.0001	120.20	Option 2: A=6.963, B=1460.793, C=207.78
Methyl-tert-butyl ether (MTBE)						3.2564	2.4812	4.2321	88.1500	0.1200	0.0828	88.15	Option 1: VP60 = 3.22 VP70 = 4.11
Toluene						0.3344	0.2375	0.4629	92.1300	0.0700	0.0050	92.13	Option 2: A=6.954, B=1344.8, C=219.48
Unidentified Components						10.1088	9.3781	9.8618	59.8943	0.6256	0.8961	89.60	
Xylene (-m)						0.0917	0.0623	0.1323	106.1700	0.0700	0.0014	106.17	Option 2: A=7.009, B=1462.266, C=215.11

**TANKS 4.0**  
**Emissions Report - Summary Format**  
**Individual Tank Emission Totals**

**Annual Emissions Report**

Components	Losses(lbs)		Total Emissions
	Working Loss	Breathing Loss	
Gasoline (RVP 13)	310.02	282.25	592.27
Hexane (-n)	1.27	1.16	2.43
Benzene	1.40	1.27	2.67
Isooctane	1.55	1.41	2.96
Toluene	1.54	1.40	2.94
Ethylbenzene	0.10	0.09	0.19
Xylene (-m)	0.42	0.38	0.81
Isopropyl benzene	0.02	0.02	0.03
1,2,4-Trimethylbenzene	0.03	0.03	0.07
Cyclohexane	0.19	0.18	0.37
Methyl-tert-butyl ether (MTBE)	25.68	23.38	49.06
Unidentified Components	277.81	252.93	530.75



**TANKS 4.0**  
**Emissions Report - Summary Format**  
**Total Emissions Summaries - All Tanks in Report**

**Annual Emissions Report**

Tank Identification				Losses (lbs)
Damon Diesel Tank	Damon	Horizontal Tank	Elkhart, Indiana	0.31
Damon Gasoline Tank	Damon	Horizontal Tank	Elkhart, Indiana	592.27
Total Emissions for all Tanks:				592.57

Appendix C: Assumed Transfer Efficiency  
For Surface Coating Operations

Company Name: Damon Corporation Plants 1, 2, 3, and 9  
 Address City IN Zip: 52570 Paul Drive and 2929 Gateway Drive, Elkhart, Indiana 46514  
 TV: 039-17521-00407  
 Reviewer: Jed D. Wolkins  
 Date: #####

Method of application	Coated Surface Type		
	Flat	"Table Leg"	"Bird Cage"
<b>Non Spray</b>			
Brush or Roller	100%	100%	100%
Flowcoating	100%	100%	100%
Electrocoating	100%	100%	100%
Dip-and-Drain	100%	100%	100%
<b>Spray</b>			
Air Atomization	50%	15%	10%
Airless	75%	10%	10%
Electrostatic Disc	95%	90%	90%
Electrostatic Airless	80%	70%	70%
Electrostatic Air Atomized	75%	65%	65%

Notes: Transfer efficiencies are from AP-40 Pages 859-861.