



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: February 15, 2005
RE: Fleetwood Motor Homes of Indiana, Inc. #44 / T 001-17529-00025
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Fleetwood Motor Homes of Indiana, Inc., # 44
1031 U.S. 224 East
Decatur, Indiana 46733**

(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. 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.

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

Operation Permit No.: T001-17529-00025	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 15, 2005 Expiration Date: February 15, 2010

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

Responsible Official:	General Manager
Source Address:	1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address:	P.O. Box 31, Decatur, Indiana 46733
General Source Phone Number:	(219) 728-2121
SIC Code:	3716
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.
- (b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.
- (c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth 3A, constructed in 1989, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack 3A.
- (d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.
- (e) One (1) 18.4 MMBtu/hr Wood-Fired Boiler, identified as HY-400-200, constructed in 1993, using a cyclone as control, and exhausting to stack 10A.

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

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

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

- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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.2 Permit Term [326 IAC 2-7-5(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 of this permit.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 July 1 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (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 "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.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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, and within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM: Main Office

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that 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 either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) 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, IDEM, OAQ, 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.
- (c) 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. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) 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.
- (e) 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).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(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 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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. This condition is not federally enforceable.

C.2 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or 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 is are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC

1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.

Testing Requirements [326 IAC 2-7-6(1)]

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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]

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

Any monitoring or testing 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 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared written emergency reduction plans (ERPs) consistent with safe operating procedures on May 20, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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, 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 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 timeframe 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 27-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all require 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. An 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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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 records 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

- (a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.
- (b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.
- (c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth 3A, constructed in 1989, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack 3A.
- (d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.

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

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63, Subpart MMMM]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.
- (b) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.
- (c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.

- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Parts and Products [40 CFR Part 63, Subpart MMMM]

- (a) Pursuant to 40 CFR 63.4481(e)(2) and 40 CFR 63.3881(e)(2), compliance with the emissions limitations specified in 40 CFR 63, Subpart PPPP shall constitute compliance with the requirements of 40 CFR 63, Subpart MMMM for the surface coating operations at this source that apply surface coatings to metal parts.
- (b) Pursuant to 40 CFR 63.3881(e)(2)(ii), the usage of surface coatings used to coat metal parts shall be less than 10% of the total of all surface coatings used at the source, measured on a mass of coating solids used basis.

D.1.4 PSD Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989, the use of VOC, including coatings, dilution solvents, and cleaning solvents used in the facilities described in this section shall be less than 244 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than 250 tons per 12 consecutive month period. Compliance with this limit makes this source a minor source under PSD and makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications made in 2001.

D.1.5 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 8-1-6]

- (a) Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989, First Significant Permit Modification 001-12860-00025, issued October 19, 2001 and 326 IAC 8-1-6, the spray/curing operations (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B) and adhesive application operation 4A doing graphics stripping, logo painting, adhesive application, finish coating, front cap painting, rear cap painting, and skirt painting shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for these operations shall be as follows:
- (1) The VOC usage per motor home shall be dependent upon the size of the motor home produced as follows:
 - (A) Small (30 foot long or less) motor homes shall be limited to a monthly average of 73 pounds of VOC per motor home.
 - (B) Large (greater than 30 foot long but less than or equal to 45 foot long) motor homes shall be limited to a monthly average of 111.5 pounds of VOC per motor home.
 - (2) Use of air atomization spray application equipment.
 - (3) Utilization of low VOC coatings.

- (4) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.
- (b) Pursuant to Second Significant Permit Modification 001-14604-00025, issued November 7, 2001, and 326 IAC 8-1-6, the usage of VOC in the coatings delivered to operators in spray/curing booths 4B, 7C and 7D shall be limited to twenty five (25) tons per twelve month consecutive period, with compliance determined on a monthly basis.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators at subassembly painting operation 3A shall be limited to 3.5 pounds of VOCs per gallon of coating less water, delivered to a coating operator that applies air dried coatings.

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

D.1.7 Particulate Emissions [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) and the 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.1.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.9 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.4, D.1.5 and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a 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 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.4, D.1.5 and D.1.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4, D.1.5 and D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.9 and 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) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount and percent solids content of each coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. The records shall distinguish between those materials used for coating metal surfaces and those materials used for coating plastic and other surfaces. The records shall show the mass of coating solids used to coat metal surfaces and the mass of coating solids used to coat plastic and other surfaces for each month.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.4, D.1.5 and D.1.6 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).
- (b) Pursuant to 40 CFR 63.4481(e)(2)(ii), the Permittee shall submit a summary of the

information to document compliance with Condition D.1.3 on an annual basis. The Permittee shall submit this report to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms provided at the end of this permit, according to the schedule specified in 40 CFR 63.4520(a).

D.1.14 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.4510(b) no later than April 19, 2005. The Permittee must submit the initial notification required by 40 CFR 63.3910(b) no later than January 2, 2005.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).
- (d) Pursuant to 40 CFR 63.4481(e)(2), the Permittee shall determine the predominant activity at their facility and submit the results of that determination with the initial notifications required by 40 CFR 63.4510(b), and 40 CFR 63.3910(b).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

- (a) The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (b) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (c) The significant permit modification application shall be submitted no later than July 19, 2006.

The significant permit modification 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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) One (1) 18.4 MMBtu/hr Wood-Fired Boiler, identified as HY-400-200, constructed in 1993, using a cyclone as control, and exhausting to stack 10A.

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

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

D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.7490(a), except when otherwise specified in 40 CFR 63 Subpart DDDDD. The Permittee must comply with these requirements on and after September 13, 2004.
- (b) Since the applicable requirements associated with the compliance options for the affected source for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.6, Notification Requirements.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

- (a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of September 13, 2004. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after September 13, 2007.
- (b) The following emissions units comprise the affected source for the large solid fuel subcategory: One (1) 18.4 MMBtu/hr wood-fired boiler (HY-400-200).
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.
- (d) Since the applicable requirements associated with the compliance options for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.6, Notification Requirements.

D.2.3 Particulate [326 IAC 6-2-4]

Pursuant to CP 001-3020-00025, issued on November 2, 1993, and 326 IAC 6-2-4, the PM from the 18.4 MMBtu/hr heat input boiler shall be limited to 0.511 pounds per MMBtu heat input. This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lbs/MMBtu) heat input.

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr).

D.2.4 Type of Wood Used [326 IAC 2-1-3(i)(8)]

Pursuant to CP 001-3020-00025, issued on November 2, 1993, no chemically treated wood shall be burned in the boiler.

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

D.2.5 Record Keeping Requirements [40 CFR 60, Subpart Dc] [326 IAC 12]

- (a) Pursuant to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, (40 CFR 60, Subpart Dc, 326 IAC 12) and in order to document compliance with Conditions D.2.3 and D.2.4, the Permittee shall maintain daily records of the amount and type of each fuel combusted in the wood-fired boiler.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

- (a) Pursuant to 40 CFR 63.7545, the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), and 63.9(b) through (h) that apply to the affected source for the large solid fuel subcategory and chosen compliance methods by the dates specified. These notifications include, but are not limited to, the following:
 - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than January 11, 2005, as required by 40 CFR 63.7545(b).
 - (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
 - (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 62.7545(e).
 - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
 - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
 - (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

- (b) The notifications required by paragraph (a) 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

The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit for the large solid fuel subcategory.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than December 13, 2006.
- (c) The significant permit modification 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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3].
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3].

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

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

D.3.1 Particulate Emissions [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from grinding and machining operations which have 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, the allowable particulate emissions from each of the brazing, cutting, soldering, welding, grinding and machining operations shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate from 100 pounds per hour 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C 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
 - C 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.

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
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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**

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: Spray Booths 2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D.
Parameter: VOC usage
Limit: Less than 244 tons per twelve month consecutive 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**

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
 Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
 Mailing Address: P.O. Box 31, Decatur, Indiana 46733
 Part 70 Permit No.: T001-17529-00025
 Facility: 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, 7B
 Parameter: VOC usage
 Limit: 73 pounds of VOC per small (30 foot long or less) motor home, 111.5 pounds of VOC per large(greater than 30 feet long but less than or equal to 45 foot long) motor home

YEAR: _____

Month	Column 1		Column 2	Column 2/Column 1
	Number of Motor Homes		Total Amount of VOC (lbs)	Amount of VOC per Motor Home (lbs)
	Small	Large		
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**

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: 4B, 7C, 7D
Parameter: VOC usage
Limit: Usage of VOC in the paint booths 4B, 7C and 7D shall be limited to less than twenty-five (25) tons per twelve (12) month consecutive period, with compliance determined on a monthly basis.

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**

**40 CFR 63, Subpart PPPP – Semi-Annual Compliance Report
 Determination of Non-Applicability of 40 CFR 63, Subpart MMMM**

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
 Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
 Mailing Address: P.O. Box 31, Decatur, Indiana 46733
 Part 70 Permit No.: T001-17529-00025
 Facility: Surface Coating Operations
 Parameter: Usage of coating solids for coating metal parts, determined on a mass of coating solids used basis, as a percentage of total coating solids used.
 Limit: Less than 10% of total mass of coating solids used, determined on an annual basis, using the average of the previous twelve month's usage records.

YEAR:

	Column 1	Column 2	(Column 1 / Column 2) x 100
	Mass of Coating Solids Used for Coating Metal Surfaces	Mass of Coating Solids Used for Coating Plastic or Other Surfaces	Percentage of Total Mass of Coating Solids Used to Coat Metal Surfaces
Average Last Twelve (12) Months			

- 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**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
 Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
 Mailing Address: P.O. Box 31, Decatur, Indiana 46733
 Part 70 Permit No.: T001-17529-00025

Months: _____ **to** _____ **Year:** _____

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., # 44
Source Location:	1031 U.S. 224 East, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	001-7465-00025
Operation Permit Issuance Date:	December 17, 1998
Permit Renewal No.:	001-17529-00025
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Fleetwood Motor Homes of Indiana, Inc., Plant # 44 relating to the operation of a stationary motor home manufacturing plant.

History and Background

Fleetwood Motor Homes of Indiana, Inc. Plant # 44 was issued a permit to construct its facilities on December 1, 1989. The plant originally consisted of a motor home manufacturing plant with major air emissions facilities consisting of a painting operation (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B), an adhesive application operation using air atomization (4A), a subassembly painting operation using air atomization (3A) and a wood-fired boiler (HY-400-200). On October 19, 2001, First Significant Permit Modification (001-12860-00025) was issued modifying the BACT limits for VOC, to allow for higher VOC emissions for painting larger motor homes. On November 7, 2001, Second Significant Permit Modification (001-14604-00025) was issued allowing the source to add additional motor home painting operations using HVLP application (4B, 7C and 7D) and a subassembly painting operation using HVLP application (3C). The subassembly painting operation (3C) was never installed.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) motor home painting operation using air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.
- (b) One (1) adhesive application operation using air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.
- (c) One (1) subassembly painting operation using HVLP spray applicators coating metal, identified as spray/curing booth 3A, constructed in 1989, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack 3A.

- (d) One (1) motor home painting operation using HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.
- (e) One (1) 18.4 MMBtu/hr Wood-Fired Boiler, identified as HY-400-200, constructed in 1993, using a cyclone as control, and exhausting to stack 10A.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3].
- (b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3].
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (f) A 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.
- (g) A petroleum fuel (other than gasoline) dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Infrared cure equipment.
- (i) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Diesel generators not exceeding 1600 horsepower.

- (n) Stationary fire pumps.

Existing Approvals

The source has been operating under the operating permit T001-7465-00025, issued on December 17, 1998, and the following modifications:

- (a) First Significant Source Modification 001-12077-00025, issued October 9, 2001;
- (b) First Significant Permit Modification 001-12860-00025, issued October 19, 2001;
- (c) Reopening 001-13122-00025, issued October 24, 2001;
- (d) Second Significant Source Modification 001-14522-00025, issued October 24, 2001;
- (e) Second Significant Permit Modification 001-14604-00025, issued November 7, 2001;
- (f) Third Significant Source Modification 001-18132-00025, issuance pending; and
- (g) Third Significant Permit Modification 001-18229-00025, issuance pending.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal 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 permit renewal application for the purposes of this review was received on March 17, 2003.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on December 17, 1998. 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 the original Part 70 operating Permit

and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating 2A, 2B, 2C, 2D, 3A, 4A, 6A, 6B, 7A, 7B	**	**	--	Less than 250 *	--	--	***
Surface Coating 4B, 7C, 7D	4.56	4.56	--		--	--	63.3
Boiler (HY-400-200)	33.6	30.4	2.01	13.7	48.4	39.5	3.09
Total PTE	Greater than 38.2	Greater than 35.0	2.01	Less than 264	48.4	39.5	Greater than 10 for a single HAP, greater than 25 for a combination of HAPs

* Pursuant to CP 01-11-93-0137, issued on December 1, 1989, the emission of VOC from the surface coating operations is limited to less than 250 tons per year.

--" Emissions are negligible (less than 0.1 tons per year).

** Particulate emissions from surface coating operations are limited by 326 IAC 6-3-2 and 40 CFR 52 Subpart P.

*** No data provided.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC 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 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	Not reported
SO ₂	Not reported
VOC	99
CO	Not reported
NO _x	Not reported
HAP	Not reported

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment

Pollutant	Status
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. .
- (b) Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The requirements of Compliance Assurance Monitoring (CAM) (40 CFR 64) are not applicable to this source. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. None of the facilities at this source have the potential to emit greater than 100 tons of a specific pollutant, and use a control device to comply with an emission limitation for that specific pollutant.
- (b) The New Source Performance Standards for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, (326 IAC 12, 40 CFR 60.40, Subpart D) are not applicable to the 18.4 MMBtu/hr wood fired boiler. The 18.4 MMBtu/hr wood fired boiler does not use fossil fuels and does not have a heat input capacity greater than 250 MMBtu per hour.
- (c) The New Source Performance Standards for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, (326 IAC 12, 40 CFR 60.40a, Subpart Da) are not applicable to the 18.4 MMBtu/hr wood fired boiler. The 18.4 MMBtu/hr wood fired boiler is not an Electric Utility Steam Generating Unit.
- (d) The New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, (326 IAC 12, 40 CFR 60.40b, Subpart Db) are not applicable to the

18.4 MMBtu/hr wood fired boiler. The 18.4 MMBtu/hr wood fired boiler's heat input capacity is less than 100 MMBtu/hr.

- (e) The 18.4 MMBtu/hr wood fired boiler is subject to the requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, (326 IAC 12, 40 CFR 60.40c, Subpart Dc). The 18.4 MMBtu/hr boiler was constructed after June 9, 1989 and the maximum heat input rate of the 18.4 MMBtu/hr wood fired boiler is greater than 10 MMBtu/hr. Pursuant to 40 CFR 60.43c(b), the Permittee shall maintain daily records of the amount and type of each fuel combusted.
- (f) The 18.4 MMBtu/hr boiler is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The 18.4 MMBtu/hr boiler comprises one existing affected source for the large solid fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the large solid fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule is not yet published in the Federal Register. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance for the large solid fuel subcategory is not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart DDDDD, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register, as required by 40 CFR 63.7545(b).
- (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
- (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 62.7545(e).
 - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
 - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
- (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
- (g) The National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ) are not applicable to the surface coating operations performed at this source. These operations do not meet the criteria specified in the definition of wood furniture or in the definition of wood furniture

components, at 40 CFR 63.801. Subpart JJ defines wood furniture as “any product made of wood... that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.” A wood furniture component is defined as “any part that is used in the manufacture of wood furniture. This source operates under SIC Code 2716 and does not manufacture w

ood furniture.

- (h) The motorhome painting operations at this source, identified as 2A, 2B, 2C, 2D, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C, and 7D are subject to the requirements of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants - Surface Coating of Plastic Parts and Products) because they apply more than 100 gallons per year of surface coatings containing HAPs to plastic parts and products and are located at a source which is a major source of HAPs. The source has provided information certifying that the surface coating of plastic parts and products accounts for greater than 90% of the surface coating activity at this source.
- (1) Pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee shall comply with these requirements on and after April 19, 2004.
 - (2) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee shall comply with these requirements on and after April 19, 2007.
 - (3) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (A) All coating operations as defined in 40 CFR 63.4581;
 - (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
 - (4) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.
 - (5) The Permittee shall submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
 - (6) The Permittee shall submit the initial notification no later than April 19, 2005.
 - (7) The Permittee shall submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status

shall contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

- (8) The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (9) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (10) The significant permit modification application shall be submitted no later than July 19, 2006. The significant permit modification 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

- (i) The motor home subassembly painting operation, identified as 3A, is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart M MMM because it sprays greater than 250 gallons per year of coatings containing HAPs onto metal parts, and is located at a source which is a major source of HAPs.

However, pursuant to 40 CFR 63.4481(e)(2)(i) and 40 CFR 63.3881(e)(2)(i), since the plastic parts and products surface coating operations at this source account for greater than ninety percent (90%) of the total surface coating operations performed at this source, compliance with the emissions limitations specified in 40 CFR 63, Subpart PPPP shall constitute compliance with the requirements of 40 CFR 63, Subpart M MMM for the surface coating operations at this source that apply coatings to metal parts.

Pursuant to 40 CFR 63.3881(e)(2) and 40 CFR 63.4481(e)(2), the Permittee shall determine the predominant surface coating activity at the source by calculating the relative percentages of surface coatings used for coating metal and plastic surfaces at the source. The Permittee shall use kilogram (kg) (or pound (lb)) of solids used as a measure of relative surface coating activity over a representative period of operation. The Permittee may estimate the relative mass of coating solids used from parameters other than coating consumption and mass solids content (e.g., design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and mass solids content must be approved by the Administrator. The Permittee may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. The Permittee shall determine the predominant activity at their facility and submit the results of that determination with the initial notification required by 40 CFR 63.4510(b). The Permittee shall determine predominant activity annually and include the determination in the next semi-annual compliance report required by 40 CFR 63.4520(a).

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted Emergency Reduction Plans on May 20, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD.

This source was originally constructed in 1989-1990. At the time of construction, in Construction Permit 01-11-93-0137, issued on December 1, 1989, the source accepted a limit on VOC of less than 250 tons per year. The PTE for PM, PM₁₀, SO₂, NO_x, VOC and CO from this source were less than 250 tons per year. This source was a minor PSD source at the time of construction.

On October 9, 2001, the source was issued First Significant Source Modification 001-12077-00025. This permit modification allowed an increase in VOC emissions per motor home produced and clarified BACT limits. The source kept the existing 250 ton per year limit on VOC emissions. The source remained a minor source under PSD after this modification.

On October 24, 2001, the source was issued Second Significant Source Modification 001-14522-00025. This modification allowed the source to construct one (1) new motor home painting operation (booths 4B, 7C and 7D). The PTE for VOC for this modification was less than the PSD significant level. The source kept the existing 250 ton per year limit on VOC emissions. Compliance with this limit makes 326 IAC 2-2 (PSD) not applicable to the modification made in 2001. The source remained a minor source under PSD after this modification.

The PTE for PM, PM₁₀, SO₂, NO_x, VOC and CO from this source is less than 250 tons per year. The permit includes conditions limiting total VOC use at the source to less than 250 tons per year. This source is a minor source under PSD.

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

On October 24, 2001, the source was issued Second Significant Source Modification 001-14522-00025, allowing the source to construct one (1) new motor home painting operation (booths 4B, 7C and 7D). The source accepted limits of less than 25 tons per year of VOC on these new facilities. In the calculations done for the technical source document for these emission units, it was determined that total emissions of a single HAP are less than ten (10) tons per year and total emissions of a combination of HAPs are less than twenty-five (25) tons per year from these three (3) new facilities. Therefore the requirements of 326 IAC 2-4.1-1 do not apply to these facilities.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the 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.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-

way, or easement on which the source is located. A violation of this section would occur if air crossing the downwind boundaries of the site were to contain fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations.

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

No facilities at this source are subject to 326 IAC 6-5 because none of the facilities at this source have potential fugitive particulate matter emissions greater than 25 tons per year after controls.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The facilities at this source were constructed after January 1, 1980 and are limited by the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-6 do not apply to this source.

State Rule Applicability – Surface Coating Operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D)

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

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

Pursuant to 40 CFR 52 Subpart P, the particulate emissions from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) shall be limited by the following:

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

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

Under the rule revision, particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (General Reduction Requirements)

(a) Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989, First Significant Permit Modification 001-12860-00025, issued October 19, 2001 and 326 IAC 8-1-6, the spray/curing operations (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B) and adhesive application operation 4A doing graphics stripping, logo painting, adhesive application, finish coating, front cap painting, rear cap painting, and skirt painting shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for these operations shall be as follows:

- (1) The VOC usage per motor home shall be dependent upon the size of the motor home produced as follows:
 - (A) Small (30 foot long or less) motor homes shall be limited to a monthly average of 73 pounds of VOC per motor home.
 - (B) Large (greater than 30 foot long but less than or equal to 45 foot long) motor homes shall be limited to a monthly average of 111.5 pounds of VOC per motor home.
- (2) Use of high transfer efficiency spray technologies (use of air atomization spray application equipment).

- (3) Utilization of low VOC coatings.
 - (4) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.
- (b) Pursuant to Second Significant Permit Modification 001-14604-00025, issued November 7, 2001, and 326 IAC 8-1-6, the usage of VOC in the coatings delivered to operators in spray/curing booths 4B, 7C and 7D shall be limited to twenty five (25) tons per twelve month consecutive period, with compliance determined on a monthly basis

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The subassembly painting operation 3A was constructed before July 1, 1990, applies surface coatings to metal and has PTE for VOC greater than 25 tons per year. Therefore, the requirements of 326 IAC 8-2-9 shall apply to this facility. Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators at subassembly painting operation 3A shall be limited to 3.5 pounds of VOCs per gallon of coating less water, delivered to a coating operator that applies air dried coatings.

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.

- (b) The spray/curing operations (2A, 2B, 2C, 2D, 3B, 4B, 6A, 6B, 7A, 7B, 7C, and 7D), and the adhesive spray operation (4A) are not subject to the requirements of 8-2-9 because they do not apply surface coatings to metal.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 are not applicable to the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) because these facilities do not apply surface coatings to wood furniture.

State Rule Applicability – 18.4 MMBtu/hr Wood-Fired Boiler

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The 18.4 MMBtu/hr bark/wood-fired boiler was constructed in 1989. Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(18.4)^{0.26}} = 0.5112 \text{ lb/MMBtu}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lbs/MMBtu) heat input.

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr)

Therefore, pursuant to 326 IAC 6-2-4, the PM emission rate limit for this 18.4 MMBtu/hr boiler is 0.5112 lb PM/MMBtu or 9.41 lbs PM per hour. [18.4 MMBtu/hr x 0.5112 lb PM/MMBtu = 9.41 lb PM/hr] Potential PM emissions from the 18.4 MMBtu/hr boiler are estimated to be 0.417 lbs/MMBtu and 7.67 lbs PM/hr. The 18.4 MMBtu/hr boiler is in compliance with this rule. (See Appendix A for detailed calculations)

State Rule Applicability – Insignificant Activities

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

Pursuant to 326 IAC 6-3-2, the particulate from the insignificant brazing equipment, cutting torches, soldering equipment, welding equipment and the insignificant grinding and machining operations 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:

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

Testing Requirements

- (a) **Surface Coating Operations**
The surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) do not have a testing requirement for PM, PM10 or VOC. The surface coating operations at this source do not have a testing requirement for PM or PM10 because each of these emissions units accounts for a small portion of the total potential to emit for PM or PM10 from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating facilities for VOC emissions because there are no VOC control devices in operation and records shall be kept of all VOCs used at the source.
- (b) IDEM may require testing at any time to determine if the facilities are in compliance with the emissions limitations contained in 326 IAC 5-1, 326 IAC 6-3-2, 326 IAC 8-1-6 and 326 IAC 8-2-9.

Compliance Requirements

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

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

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

1. The surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks (2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a 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.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this stationary motor home manufacturing plant shall be subject to the conditions of this Part 70 permit T001-17529-00025.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 (Title V) Permit Renewal

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., # 44
Source Location:	1031 U.S. 224 East, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	001-17529-00025
Permit Reviewer:	ERG/ST

On November 4, 2004, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Fleetwood Motor Homes of Indiana, Inc. had applied for a Part 70 Permit Renewal (also called a Title V Permit) to operate a stationary motor home manufacturing plant. 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.

On December 1, 2004, Fleetwood Motor Homes of Indiana, Inc. (Fleetwood) submitted comments on the proposed Part 70 (Title V) Renewal. The summary of the comments is as follows:

Comment 1:

Condition D.1.4, PSD Minor Limit. This condition establishes a VOC limit of 236.3 tons per 12 consecutive month period for the surface coating operations and states that this limit is needed in order for the source to remain a minor source under the PSD program. The basis for the limit of 236.3 tons per year (tpy) is not described in the permit. It is assumed that the limit was established subtracting the PTE for the boiler (13.7 tpy) (found on page 4 of 13 of the Technical Support Document (TSD)) from 250 tpy and the remainder (236.3 tpy) was determined to be the surface coating operations limit. Fleetwood does not agree with this methodology. A limit is needed in order for the source to remain a minor source; however, Fleetwood does not agree with the 236.3 tpy limit because the VOC emissions of 13.7 tpy is listed on page 4 of 13 of the TSD and does not correspond with the emission calculations on page 1 of 3 in Appendix A. This calculation spreadsheet shows a PTE of 1.4 tpy VOC.

Fleetwood requests that the VOC limit for the surface coating operations found in Condition D.1.4 be changed to 244 tpy, such that the boiler emissions would be limited to 6 tpy of VOC. This limit will still allow the source to remain a minor source since the emissions from the entire facility will be less than 250 tpy.

Response to Comment 1:

The PTE for VOC for the wood fired boiler listed in the "Potential to Emit" table is based on an incorrect emission factor. This PTE figure should have been listed as 1.4 tons per year of VOC emissions from the wood fired boiler, as shown in the following tables:

Pollutant Emission Factors (lbs/MMBtu)								
PM *	PM10 *	SO ₂	NOx	CO	VOC	HAP (metals)	HAP (other)	
0.400	0.360	0.025	0.49	0.60	0.47 0.017	1.76E-03	3.66E-02	

Potential To Emit (tons/yr)								
Heat Input Capacity (MMBtu/hr)	PM	PM10	SO ₂	NOx	CO	VOC	HAP (metals)	HAP (other)
18.4	32.2	29.0	2.01	39.5	48.4	13.7 1.37	0.14	2.95

The PSD limit for the surface coating operations will be raised to 244 tons per year, as requested by the Permittee. Condition D.1.4 and the Quarterly VOC Report form of the permit have been revised as shown below (bolded language has been added, the language with a line through it has been deleted). No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

D.1.4 PSD Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit 01-11-93-0137, issued on December 1, 1989, the use of VOC, including coatings, dilution solvents, and cleaning solvents used in the facilities described in this section shall be less than ~~236.3~~ **244** tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than 250 tons per 12 consecutive month period. Compliance with this limit makes this source a minor source under PSD and makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications made in 2001.

...

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

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
 Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
 Mailing Address: P.O. Box 31, Decatur, Indiana 46733
 Part 70 Permit No.: T001-17529-00025
 Facility: Spray Booths 2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D.
 Parameter: VOC usage
 Limit: Less than ~~236.3~~ **244** tons per twelve month consecutive period, with compliance determined at the end of each month.

.....

Comment 2:

Conditions D.2.6 and D.2.7, Visible Emissions Notations and Cyclone Inspections, require Fleetwood to perform visible emissions notations and cyclone inspections. This requirement had not been included in the original, current version of the Title V permit. Fleetwood believes that IDEM established guidance for preventive maintenance and compliance monitoring requirements prior to issuing the 1990 CAA permits in Indiana, which considered compliance monitoring requirements unnecessary if the allowable emissions of PM/PM10 are less than 10 lbs/hour when using a control device. Condition D.2.3 limits the boiler to 0.511 lbs PM per MMBtu heat input and as described on page 11 of 13 of the TSD, the allowable PM emission rate is 9.41 lbs/hour. Additionally, as shown in the emission calculations in the TSD Appendix, the potential uncontrolled PM emissions are 32.2 tpy or 7.35 lbs/hour. Since both the uncontrolled PTE and the allowable PM emissions are less than 10 lbs/hour, Fleetwood believes that compliance monitoring is not warranted and requests that IDEM remove these conditions (and associated record keeping requirements) from the permit.

Response to Comment 2:

As stated by the Permittee, the PM emissions from the wood fired boiler are limited to less than 9.41 pounds per hour by 326 IAC 6-2-4. The calculated uncontrolled PM emissions from the boiler are 7.36 pounds per hour when operating at maximum rated capacity. Since the control device is not required to meet the 9.41 pound per hour PM limit, the permit has been changed as follows (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

~~D.2.1~~ ~~General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

...

- (b) Since the applicable requirements associated with the compliance options for the affected source for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition ~~D.2.10~~ **D.2.6**, Notification Requirements.

~~D.2.2~~ ~~National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]~~

...

- (d) Since the applicable requirements associated with the compliance options for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition ~~D.2.10~~ **D.2.6**, Notification Requirements.

~~D.2.5~~ ~~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 Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.6~~ ~~Visible Emissions Notations~~

- (a) ~~Visible emission notations of the wood fired boiler (HY-400-200) stack exhaust (10A) shall be performed once per shift during normal daylight operations when exhausting to~~

~~the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.~~

~~D.2.7 Cyclone Inspections~~

~~An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

~~D.2.8 Cyclone Failure Detection~~

~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). 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.~~

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

D.2.95 Record Keeping Requirements [40 CFR 60, Subpart Dc] [326 IAC 12]

- (a) Pursuant to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, (40 CFR 60, Subpart Dc, 326 IAC 12) and in order to document compliance with Conditions D.2.3 and D.2.4, the Permittee shall maintain daily records of the amount and type of each fuel combusted in the wood-fired boiler.**
- ~~(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.~~
- ~~(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.~~
- ~~(d) To document compliance with Condition D.2.5, the Permittee shall maintain records of any inspections prescribed by the Preventive Maintenance Plan.~~

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

**Appendix A: Emission Calculations
Combustion Emissions - 18.4 MMBtu Wood-Fired Boiler**

Company Name: Fleetwood Motor Homes of Indiana, Inc., Plant # 44
Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Title V: 001-17529-00025
Reviewer: ERG/ST
Date: July 23, 2004

Pollutant Emission Factors (lbs/MMBtu)							
PM *	PM10 *	SO ₂	NO _x	CO	VOC	HAP (metals)	HAP (other)
0.400	0.360	0.025	0.49	0.60	0.02	1.76E-03	3.66E-02

Potential To Emit (tons/yr)								
Heat Input Capacity (MMBtu/hr)	PM	PM10	SO ₂	NO _x	CO	VOC	HAP (metals)	HAP (other)
18.4	32.2	29.0	2.01	39.5	48.4	1.4	0.14	2.95

This source burns only dry wood which has a heat value of 8,000 Btu / lb.

Emission Factors are from AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, (dry wood) Tables 1.6-1, 1.6-2, 1.6-3 and 1.6-4 (9/03).

HAP emissions from the wood-fired boilers include acetaldehyde, acrolin, arsenic, benzene, chlorine, chromium, formaldehyde, hydrogen chloride, lead, manganese, nickel and styrene.

Methodology

PTE (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x 1/2000 (ton/lbs).

**Appendix A: Emission Calculations
VOC and PM Emissions: Spray Coating Operations**

Company Name: Fleetwood Motor Homes of Indiana, Inc., Plant # 44
Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Title V: 001-17529-00025
Reviewer: ERG/ST
Date: July 23, 2004

1. Potential To Emit for Spray Coating Operations

Emissions Unit ID	Material	Density (lb/gal)	Weight % Water	Weight % VOC	Weight % Solids	Application Rate (gal/unit)	Throughput (unit/hour)	Pounds VOC per Gallon of Coating	PTE VOC (lbs/hr)	PTE VOC (tons/yr)	PTE PM/PM10 Before Controls (tons/yr)	PTE PM/PM10 After Controls (tons/yr)	
3C Chassis Booth	Black enamel 5-268D	12.4	0.00%	28.1%	71.9%	1.40	0.90	3.49	4.40	19.3	12.3	2.46	
4B Parts Booth	Basecoat as used	8.88	0.00%	66.4%	26.5%	0.009	7.00	5.90	0.37	1.63	0.16	0.03	
	Clearcoat as used	7.60	0.00%	74.7%	21.5%	0.009	7.00	5.68	0.36	1.57	0.11	0.02	
7C Paint Booth	Basecoat as used	8.88	0.00%	66.4%	26.5%	1.30	1.75	5.90	13.4	58.8	5.86	1.17	
	Clearcoat as used	7.60	0.00%	74.7%	21.5%	1.30	1.75	5.68	12.9	56.6	4.07	0.81	
7D Repair Booth	Basecoat as used	8.88	0.00%	66.4%	26.5%	0.036	1.75	5.90	0.37	1.63	0.16	0.03	
	Clearcoat as used	7.60	0.00%	74.7%	21.5%	0.036	1.75	5.68	0.36	1.57	0.11	0.02	
Cleaning - Booths 3C, 4B, 7C, 7D	Thinner	7.01	0.00%	100%	0.00%	1.02	1.00	7.01	7.15	31.3	0.00	0.00	
									PTE Totals (tons/yr)		172	22.8	4.56

Assume all PM are equal to PM10

Assume transfer efficiency of 75% for HVLP spray guns and control efficiency of 80% for dry filters.

Assume all VOC volatilizes and is emitted. Assume all HAP is emitted.

METHODOLOGY

PTE VOC (lbs/hr) = Density (lbs/gal) x Weight % VOC x Application rate (gal/unit) x Throughput (units/hr)

PTE VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Application rate (gal/unit) x Throughput (units/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs)

PTE PM/PM10 Before Controls (tons/yr) = Density (lbs/gal) x Weight % Solids x Application rate (gal/unit) x Throughput (units/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs) x (1-Transfer Efficiency %)

PTE PM/PM10 After Controls (tons/yr) = PTE PM/PM10 Before Controls (tons/yr) x (1- Control Efficiency %)

**Appendix A: Emission Calculations
HAP Emissions: Spray Coating Operations**

Company Name: Fleetwood Motor Homes of Indiana, Inc., Plant # 44
Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Title V: 001-17529-00025
Reviewer: ERG/ST
Date: July 23, 2004

1. Potential To Emit for Spray Coating Operations

Material	Density (lb/gal)	Maximum Rate (gal/hr)	Weight % Xylene	Weight % Ethyl-benzene	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Methanol	Weight % Toluene	Potential to Emit (tons/yr)						
										Xylene (tons/yr)	Ethyl-benzene (tons/yr)	MEK (tons/yr)	MIBK (tons/yr)	Glycol Ethers (tons/yr)	Methanol (tons/yr)	Toluene (tons/yr)
Black enamel 5-268D	12.4	1.26	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Basecoat BCS605	7.24	1.20	51.0%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	19.4	3.42	0.00	0.00	0.00	0.00	0.00
Basecoat USL-55895	10.5	1.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat CC-633	7.89	1.20	0.00%	0.00%	9.00%	9.00%	0.00%	0.00%	0.00%	0.00	0.00	3.73	3.73	0.00	0.00	0.00
Clearcoat US4	7.31	1.20	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	4.61	0.00	0.00
Lacquer Thinner	7.01	1.02	0.00%	0.00%	9.57%	9.53%	0.00%	9.46%	62.1%	0.00	0.00	3.00	2.98	0.00	2.96	19.5
PTE Totals Worst Case (tons/yr)										19.4	3.42	6.73	6.72	4.61	2.96	19.5

Assume all HAP is emitted.

METHODOLOGY

PTE HAPs (tons/yr) = Density (lbs/gal) x Weight % HAPs x Maximum Rate (gal/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs)