



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 26, 2004

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

TO: Interested Parties / Applicant

RE: Consolidated Leisure Industries, LLC / SSM 039-17691-00192

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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.

Enclosures
FNPER.dot 9/16/03



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SIGNIFICANT SOURCE MODIFICATION PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

Second Significant Source Modification No.: 039-17691-00192	Sections Affected: A.2, D.1, D.4, Report Forms
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 26, 2004

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary motor home custom coating source.

Responsible Official: Michael R. Terlep
Source Address: 21888 Beck Drive, Elkhart, Indiana 46514
Mailing Address: 423 N. Main Street, P.O. Box 30, Middlebury, Indiana 46540
Phone Number: 574-825-8493
SIC Code: 3089 & 3716
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) paint room, known as Booth #1, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.
- (b) One (1) spray booth, identified as Booth #2, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (c) One (1) spray booth, identified as Booth #3, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.
- (d) One (1) spray booth, identified as Booth #4, equipped with dry filters for particulate control, exhausting to Stacks S11 and S12, capacity: 0.75 recreational vehicles per hour.

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint room, known as Booth #1, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

For the one (1) paint room, identified as Booth #1, and the three (3) paint spray booths contained in Section D.4 of this permit (Booths #2, #3 and #4), Best Available Control Technology (BACT) has been determined to be:

- (a) The total VOC delivered to the applicators at the four (4) booths (Booths #1, #2, #3 and #4), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and

- (b) The following management and work practices shall apply:

- (1) All coatings will be applied with high-volume low-pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control.

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

- (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (3) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.
- (5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (7) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency.

- (8) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) paint room, known as Booth #1, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

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

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) paint room, known as Booth #1 is in operation.

D.1.8 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 Booth #1 Stacks S1 - S6 while the paint room is in operation. The

Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) 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 Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

This section of the permit has been deleted.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (b) One (1) spray booth, identified as Booth #2, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (c) One (1) spray booth, identified as Booth #3, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.
- (d) One (1) spray booth, identified as Booth #4, equipped with dry filters for particulate control, exhausting to Stacks S11 and S12, capacity: 0.75 recreational vehicles per hour.

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

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

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (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 P. The Permittee must comply with these requirements on and after April 19, 2004.
- (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.

D.4.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart P (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.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
 - (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.4.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) spray booths (Booths #2, #3 and #4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

For the three (3) paint spray booths, identified as Booths #2, #3 and #4, and the one (1) paint room contained in Section D.1 of this permit (Booth #1), Best Available Control Technology (BACT) has been determined to be:

- (a) The total VOC delivered to the applicators at the four (4) booths (Booths #1, #2, #3 and #4), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
- (b) The following management and work practices shall apply:
 - (1) All coatings will be applied with high-volume low-pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
 - (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (3) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
 - (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.
 - (5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

- (7) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency.
- (8) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

D.4.5 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 the three (3) spray booths (Booths #2, #3 and #4) and their associated control devices.

Compliance Determination Requirements

D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.4.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.4.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) spray booths (Booths #2, #3 and #4) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.4.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S7, S8, S9, S10, S11 and S12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, 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 established in Condition D.4.4.
- (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (3) The total VOC usage for each month;
- (b) To document compliance with Condition D.4.7 and D.4.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.4.11 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 you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later. For an existing affected source, the Permittee must submit the initial notification no later than April 19, 2005. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.
- (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 your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.4.12 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 Title V permit.

- (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 Title V 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.
- (b) The significant permit modification application shall be submitted no later than July 19, 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

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facilities: Booths #1, #2, #3 and #4
Parameter: Total VOC delivered to the applicators
Limit: Less than 150 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Consolidated Leisure Industries, LLC
Source Location:	21888 Beck Drive, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3089 & 3716
Operation Permit No.:	T 039-10599-00192
Operation Permit Issuance Date:	November 12, 1999
Significant Source Modification No.:	039-17691-00192
Significant Permit Modification No.:	039-17862-00192
Permit Reviewer:	Edward A. Longenberger

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

One (1) spray booth, identified as Booth #4, equipped with dry filters for particulate control, exhausting to Stacks S11 and S12, capacity: 0.75 recreational vehicles per hour.

History

Consolidated Leisure Industries, LLC was issued a Part 70 Operating Permit on November 12, 1999. On May 2, 2003, Consolidated Leisure Industries, LLC submitted an application to the OAQ requesting to add an additional spray booth to their existing plant.

The applicant has also requested to implement a single VOC limit of less than 150 tons per year, instead of the previous VOC limitation of less than 113.4 tons per year at Booth #1 (formerly known as Plant #840), and the VOC limitations on Booths #2 and #3 (formerly DPB-1 and DPB-2) of less than 25 tons per year, each. The new proposed limit of less than 150 tons of VOC per year would include the proposed Booth #4. Pursuant to 326 IAC 8-1-6, the applicant has submitted a new BACT analysis which considers the best available control technology for the four (4) spray booths.

The proposed spray booth will be subject to the NESHAP 40 CFR 63, Subpart PPPP, since the booth coats plastic parts and is located at a major source of HAPs. The applicant will also re-configure their operations in such a way that the current HAPs limits on two (2) of the existing booths will no longer be effective. These booths will now be subject to the requirements of 326 IAC 2-4.1 (New source toxics control).

In addition, the applicant has informed OAQ that the plastic thermoforming process, which was identified as Plant #830, is no longer in operation. All references to this operation will be removed from the Part 70 operating permit.

Source Definition

This recreational vehicle custom coating source consists of two (2) plants, both located at 21888 Beck Drive, Elkhart, Indiana 46516. The two (2) plants are located on the same property, have the

same SIC codes and are owned by one (1) company. Pursuant to the source determination made in T 039-10599-00192, issued November 12, 1999, the two (2) plants are considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S11	Booth #4	24	2.97	20,000	amb.
S12	Booth #4	24	2.97	20,000	amb.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 2, 2003. Additional information was received on August 25, 2003.

Emission Calculations

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

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	6.07
PM ₁₀	6.07
SO ₂	-
VOC	173
CO	-

Pollutant	Potential To Emit (tons/year)
NO _x	-

HAPs	Potential To Emit (tons/year)
Xylene	7.21
Toluene	13.5
Methyl Methacrylate	0.451
Glycol Ether	0.451
O-Cresol	0.451
Ethylbenzene	1.35
Cumene	0.451
TOTAL	23.9

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(2), since it is subject to the requirements of 326 IAC 8-1-6. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-17862-00192) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Elkhart County.

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

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Furthermore, the source remains an existing minor stationary source even with the addition of the proposed spray booth (Booth #4). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant permit modification does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 (Booth #4), with the potential to emit before controls equal to or greater than the major source threshold for VOC and HAPs, and is subject to an emission limitation or standard for VOC and HAPs. However, the source does not use a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63.4480, Subpart PPPP, Plastic Parts Surface Coating, will be applicable to this proposed modification. The rule has not yet been printed in its final format. When the rule is made final, the Permittee will have to apply for a modification to their Part 70 Operating Permit.

State Rule Applicability - Individual Facilities

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

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

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

The potential to emit of a single HAP from the proposed spray booth (Booth #4) is greater than ten (10) tons per year. Furthermore, the source is proposing to re-configure their spray painting operations in such a way that the two (2) existing spray booths (Booth #2 and Booth #3, formerly known as DPB-1 and DPB-2) and the proposed new spray booth (Booth #4) will work together in series. Products will be given a base coat in Booth #4, and then will proceed to either Booth #2 or Booth #3, where they will receive finishing coats. Thus, Booths #2 and #3 are no longer independent processes, and the existing HAPs limitations are no longer effective. The applicant has agreed that Booths #2, #3 and #4 will be considered as one (1) process for the purposes of 326 IAC 2-4.1, and will be subject to the requirements therein.

The spray booths coat reinforced plastic recreational vehicles. The applicant has agreed to limit HAP emissions from Booths #2, #3 and #4 such that they would comply with the Maximum Achievable Control Technology requirements of the NESHAP for surface coating of plastic parts and products, 40 CFR 63, Subpart PPPP. Thus, the requirements of 326 IAC 2-4.1 are satisfied.

Pursuant to the 40 CFR 63.4481(a)(5), the motor homes and travel trailers are intended for on-road use and are, therefore, considered on-road vehicles. Therefore, the HAPs emissions from Booths #2, #3 and #4 shall not exceed 1.34 pounds of organic HAP per pound of coating solids used during each twelve (12) consecutive month compliance period, with compliance determined at the end of

each month. This limit shall include all coatings, thinners, additives and cleaning materials. In order to comply with this limit, the Permittee must keep track of the mass of organic HAP in each coating, thinner, additive, or cleaning material used and the total mass of all coating solids used during each month. The mass of organic HAP for the most recent twelve (12) month period divided by the mass of coating solids for the same twelve (12) month period must be less than 1.34, as determined each month.

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

The spray booths at this source apply coatings to fiberglass motor home parts, and as such are not subject to any of the specific VOC limitations contained in 326 IAC 8. Since the booths each have a VOC potential to emit greater than twenty-five (25) tons per year, the booths are subject to the requirements of 326 IAC 8-1-6.

The existing spray booth, identified as Booth #1 (formerly known as Plant #840), was limited to less than 113.4 tons per year of VOC, pursuant to the Best Available Control Technology (BACT) determination in T 039-10599-00192. The two (2) spray booths, identified as Booths #2 and #3 (formerly DPB-1 and DPB-2), were each limited to less than twenty-five (25) tons per year of VOC, in order to render the requirements of 326 IAC 8-1-6 not applicable. The applicant has requested that these previous limitations be replaced by a single VOC limit for Booths #1 through #4. This requires a new BACT analysis for the four (4) booths.

A top-down BACT analysis from Consolidated Leisure Industries, LLC was received on August 25, 2003. The source has agreed to limit the total VOC emissions from the four (4) surface coating booths (Booths #1, #2, #3 and #4) to less than 150 tons per year. This baseline was used for the BACT analysis. The BACT analysis evaluated seven (7) add-on control options: condensation, carbon adsorption, liquid absorption, flares, catalytic oxidation, recuperative thermal oxidation and regenerative thermal oxidation.

- (a) Condensation is not technically feasible because such systems are only effective for gas streams containing high concentrations of high molecular weight VOCs (e.g. heavy oils) that can be condensed at relatively high temperatures.
- (b) Carbon adsorption is not technically feasible because the coatings used at the plant may contain ketones, which can polymerize exothermally on the carbon surface. Thus, continual exposure to ketones may result in carbon bed fires.
- (c) Liquid absorption is only technically feasible when the gas constituents are soluble in an aqueous sorbate, such as water. At this facility, at least half of the VOCs are insoluble in water (e.g. toluene and xylene), therefore absorption is not a technically feasible control option for the four (4) spray booths.
- (d) A flare is not technically feasible due to the low concentrations of VOC expected in the exhaust gas stream. The low VOC concentrations will not support combustion.
- (e) Catalytic oxidation is not technically feasible due to the likelihood that the various paints used at the facility contain compounds which will "mask" or "poison" the catalyst over time, rendering the control device ineffective. Consolidated Leisure has elected to consider the cost of this option anyway. The cost analysis below shows that this option is not economically feasible due to a cost of \$27,242 per ton of VOC removed.

Recuperative thermal oxidation and regenerative thermal oxidation, while both technically feasible, are not economically feasible due to the prohibitive cost of \$58,421 and \$20,451 per ton of VOC removed, respectively. Cost information for these options are detailed in the following BACT Cost Analysis. The cost analysis assumes an annual interest rate of seven percent (7%), which is consistent with current economic factors, and an equipment lifetime of ten (10) years, which is reasonable for the type of equipment being considered:

Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Catalytic oxidation	\$1,767,058	\$530,118	\$547,788	\$2,844,964
Regenerative thermal oxidation	n/a	n/a	n/a	\$5,599,584
Recuperative thermal oxidation	\$704,916	\$211,475	\$218,524	\$1,134,916

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Catalytic oxidation	\$3,174,250	\$131,934	\$371,451	\$3,677,635
Regenerative thermal oxidation	\$1,732,306	\$231,340	\$797,255	\$2,760,901
Recuperative thermal oxidation	\$7,661,771	\$63,532	\$161,586	\$7,886,890

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Catalytic oxidation	150	135	90	\$27,242
Regenerative thermal oxidation	150	135	90	\$20,451
Recuperative thermal oxidation	150	135	90	\$58,421

BACT for the four (4) surface coating booths (Booths #1, #2, #3 and #4) has been determined to be:

- (a) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
- (b) The following management and work practices shall apply:
 - (1) All coatings shall be applied with high-volume low-pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control.
 - (2) The spray guns used shall be the type that can be cleaned without the need for

spraying the solvent into the air.

- (3) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.
- (5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (7) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency.
- (8) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

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

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

Pursuant to 326 IAC 6-3 and 40 CFR 52 Subpart P the particulate matter (PM) from the proposed spray booth (Booth #4) 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 spray booth (Booth #4) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Requirements

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

ments are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The proposed spray booth, identified as Booth #4, has applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S11 and S12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the proposed spray booth (Booth #4) must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7 (Part 70).

Proposed Changes

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

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

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

- (a) One (1) paint room, known as **Booth #1** ~~Plant #840~~, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.
- (b) ~~One (1) plastic forming area, known as Plant #830, exhausted to general ventilation, capacity: 100 plastic sheets per hour.~~

- (b e) One (1) spray booth, identified as **Booth #2 DPB-1**, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (c d) One (1) spray booth, identified as **Booth #3 DPB-2**, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.
- (d) **One (1) spray booth, identified as Booth #4, equipped with dry filters for particulate control, exhausting to Stacks S11 and S12, capacity: 0.75 recreational vehicles per hour.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint room, known as **Booth #1 Plant #840**, installed after 1980, equipped with dry filters for particulate matter control, exhausted to Stacks S1 - S6, capacity: 1.42 vehicles per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~(a) For the one (1) paint room, identified as Booth #1, and the three (3) paint spray booths contained in Section D.4 of this permit (Booths #2, #3 and #4), Best Available Control Technology (BACT) has been determined to be~~ determined to limit the VOC delivered to the applicators to 113.4 tons per twelve (12) consecutive month period from the one (1) paint room, known as Plant #840, a maximum VOC content of any coating of 9.15 pounds of VOC per gallon of coating, less water on a daily weighted average basis and the following management and work practices:

- (a) **The total VOC delivered to the applicators at the four (4) booths (Booths #1, #2, #3 and #4), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and**

- (b) **The following management and work practices shall apply:**

- (1) All coatings will be applied with high-volume low-pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control.

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

- (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (3) The cleanup solvent containers used to transport solvent from drums to work areas

shall be closed containers having soft gasketed spring-loaded closures.

- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.
 - (5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (7) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency.
 - (8) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.
- (b) ~~The revised Best Available Control Technology (BACT) analysis established in Condition D.1.1(a) of this permit replaces the previous BACT determination established in Condition No. 3 of CP 039-4818-00196, issued to LCM Transshield, Inc (the previous owner) on July 23, 1996. The previous BACT for the spray painting area, the buffing area and the vehicle preparation of area consisted of the following:~~
- (1) ~~Limit the actual emissions of VOC to 4.66 tons per month from the spray painting, vehicle preparation area and the vehicle buffing area;~~
 - (2) ~~Use surface cleaner with 16% or lower by weight VOC content in the spray painting area; and~~
 - (3) ~~Use high-volume low-pressure (HVLP) spray guns to lower VOC emissions in the spray painting area.~~

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) paint room, known as **Booth #1 Plant #840**, shall not exceed the pound per hour emission rate established as E in the following formula:

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) paint room, known as **Booth #1 Plant #840** is in operation.

D.1.8 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 known as **Booth #1 Plant #840** Stacks S1 - S6 while the paint room is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

This section of the permit has been deleted.

~~(b) One (1) plastic forming area, known as Plant #830, exhausted to general ventilation, capacity: 100 plastic sheets per hour.~~

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

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW:~~

Construction Conditions

General Construction Conditions

~~D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

Effective Date of the Permit

~~D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.~~

~~D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.~~

~~There are no applicable operating conditions for the one (1) plastic forming area, known as Plant #830.~~

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (b e) One (1) spray booth, identified as **Booth #2 DPB-1**, equipped with dry filters for particulate control, exhausting to Stacks S7 and S8, capacity: 0.25 recreational vehicles per hour.
- (c d) One (1) spray booth, identified as **Booth #3 DPB-2**, equipped with dry filters for particulate control, exhausting to Stacks S9 and S10, capacity: 0.25 recreational vehicles per hour.
- (d) **One (1) spray booth, identified as Booth #4, equipped with dry filters for particulate control, exhausting to Stacks S11 and S12, capacity: 0.75 recreational vehicles per hour.**

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

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

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

- (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 the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (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.

D.4.2 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]

- (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 the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.
- (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.
- (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, which are incorporated by reference.

D.4.34 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the **three (3) two (2) spray booths (Booths #2, #3 and #4 DPB-1 and DPB-2)** shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.4.42 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

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

For the three (3) paint spray booths, identified as Booths #2, #3 and #4, and the one (1) paint room contained in Section D.1 of this permit (Booth #1), Best Available Control Technology (BACT) has been determined to be:

- (a) The total VOC delivered to the applicators at the four (4) booths (Booths #1, #2, #3 and #4), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
- (b) The following management and work practices shall apply:
 - (1) All coatings will be applied with high-volume low-pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten

(10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.**
- (3) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.**
- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.**
- (5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**
- (6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.**
- (7) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency.**
- (8) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.**

D.4.53 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

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

Pursuant to 326 IAC 2-4.1-1, the HAPs usage at the three (3) spray booths (Booths #2, #3 and #4) shall be limited to no more than 1.34 pounds of organic HAP per gallon of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials.

D.4.64 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the **three (3) two (2) spray booths (Booths #2, #3 and #4 DPB-1 and DPB-2)** and their associated control devices.

Compliance Determination Requirements

D.4.75 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.4.42 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance with the HAP limit in Condition D.4.5 shall be determined at the end of each month by using the following equation and shall be based on the most recent twelve (12) consecutive month period:

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

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

D.4.96 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the **three (3) two (2)** spray booths (**Booths #2, #3 and #4 DPB-1 and DPB-2**) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.4.107 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S7, S8, S9, and S10, **S11 and S12**) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.4.118 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.42 and D.4.53, the Permittee shall maintain records in accordance with (1) through (7 4) below. Records maintained for (1) through (7 4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAPs usage limits established in Conditions D.4.42 and D.4.53.

- (1) The VOC and HAPs content of each coating material and solvent used;
 - (2) The solids content of each coating used;**
 - (3 2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (4 3) The total VOC and HAPs usage for each month; ~~and~~
 - (5) The total coating solids usage each month;**
 - (6) The HAP usage in pounds of HAPs per gallon of coating solids for each compliance period; and**
 - (7) All calculations used to demonstrate compliance with Condition D.4.5.**
 - ~~(4) The weight of VOC and HAPs emitted for each compliance period.~~
- (b) To document compliance with Condition D.4.96 and D.4.107, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.129 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.4(a)2 and D.4.53 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee ~~does~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.4.13 Notification Requirements [40 CFR 63.4510]

- (a) **General.** You 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 you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) **Initial notification.** You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.

- (c) **Notification of compliance status.** You 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 your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.4.14 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 Title V permit.

- (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 Title V 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.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (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

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
 Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
 Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
 Part 70 Permit No.: T 039-10599-00192
 Facilities: **Booths #1, #2, #3 and #4 Spray booth (DPB-1)**
 Parameter: Total VOC delivered to the applicators
 Limit: Less than ~~150~~ **twenty-five (25)** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Consolidated Leisure Industries, LLC
Source Address: 21888 Beck Drive, Elkhart, Indiana 46516
Mailing Address: 423 N. Main Street, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-10599-00192
Facilities: Booths #2, #3 and #4
Parameter: HAP usage
Limit: No more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month, based on the following equation:

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

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

☛ No deviation occurred in this month.

☛ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

No deviation occurred in this month.

Deviation/s occurred in this month:

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. **039-17691-00192** and Significant Permit Modification No. **039-17862-00192**.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name:	Consolidated Leisure Industries, LLC
Source Location:	21888 Beck Drive, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3089 & 3716
Operation Permit No.:	T 039-10599-00192
Significant Source Modification No.:	039-17691-00192
Permit Reviewer:	Edward A. Longenberger

On November 1, 2003, the Office of Air Quality (OAQ) had a notice published in The Truth, Elkhart, Indiana, stating that Consolidated Leisure Industries, LLC had applied for a Significant Source Modification to a Part 70 Operating Permit to construct a spray booth with dry filters for particulate control. The notice also stated that OAQ proposed to issue a Significant Source Modification and provided information on how the public could review the proposed Significant Source Modification 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 Significant Source Modification to a Part 70 Operating Permit should be issued as proposed.

On December 1, 2003, Mark A Horne of Environmental Partners, Inc., on behalf of Consolidated Leisure Industries, LLC, submitted comments on the proposed Significant Source Modification to a Part 70 Operating Permit. The summary of the comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Consolidated Leisure Industries, LLC requests that draft Condition D.4.5 be deleted from the permit since the New Source Toxics Control provisions of 326 IAC 2-4.1 do not apply to the proposed modification.

Response 1:

The IDEM, OAQ agrees. The U.S. EPA Administrator has published a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. The final version of the MACT was published in the Federal Register on April 19, 2004. Pursuant to 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1 do not apply to a source which is specifically regulated by a standard issued pursuant to Section 112(d) of the Clean Air Act. Therefore, Conditions D.4.5 and D.4.8 are deleted, and the resultant changes to condition numbers, record keeping and reporting requirements are made as shown:

~~D.4.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]~~

~~Pursuant to 326 IAC 2-4.1-1, the HAPs usage at the three (3) spray booths (Booths #2, #3 and #4) shall be limited to no more than 1.34 pounds of organic HAP per gallon of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials.~~

D.4.56 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.4.67 Volatile Organic Compounds (VOC)

~~D.4.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]~~

~~Compliance with the HAP limit in Condition D.4.5 shall be determined at the end of each month by using the following equation and shall be based on the most recent twelve (12) consecutive month period:~~

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

D.4.79 Particulate [326 IAC 6-3-2(d)]

~~D.4.810~~ Monitoring

~~D.4.911~~ Record Keeping Requirements

- (a) To document compliance with Conditions D.4.4 and ~~D.4.5~~, the Permittee shall maintain records in accordance with (1) through (37) below. Records maintained for (1) through (37) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAPs usage limits established in Conditions D.4.4 and ~~D.4.5~~.
- (1) The VOC and HAPs content of each coating material and solvent used;
 - ~~(2) The solids content of each coating used;~~
 - (23) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (34) The total VOC and HAPs usage for each month;
 - ~~(5) The total coating solids usage each month;~~
 - ~~(6) The HAP usage in pounds of HAPs per gallon of coating solids for each compliance period; and~~
 - ~~(7) All calculations used to demonstrate compliance with Condition D.4.5.~~
- (b) To document compliance with Condition D.4.79 and ~~D.4.810~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.4.102~~ Reporting Requirements

~~A quarterly summary of the information to document compliance with Conditions D.4.4(a) and D.4.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

D.4.113 Notification Requirements [40 CFR 63.4510]

~~D.4.124~~ Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

Part 70 Quarterly Report

Source Name: ~~Consolidated Leisure Industries, LLC~~
 Source Address: ~~21888 Beck Drive, Elkhart, Indiana 46516~~
 Mailing Address: ~~423 N. Main Street, Middlebury, Indiana 46540~~
 Part 70 Permit No.: ~~T 039-10599-00192~~
 Facilities: ~~Booths #2, #3 and #4~~
 Parameter: ~~HAP usage~~
 Limit: ~~No more than 1.34 pounds of organic HAP per pound of coating solids used per twelve (12) consecutive month period, with compliance determined at the end of each month, based on the following equation:~~

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

YEAR: _____

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

- 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.

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

Change 1:

The U.S. EPA Administrator has published a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. The final version of the MACT was published in the Federal Register on April 19, 2004. Therefore, April 19, 2004 becomes the effective date of this rule. As a result, specific dates have replaced references to the effective date where applicable. Also, some typographical errors were corrected:

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501~~2398~~]

(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** ~~the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.~~

(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.

D.4.2 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]

(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** ~~the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.~~

(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.

(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 which are incorporated by reference.**

D.4.11 Notification Requirements [40 CFR 63.4510]

- (a) General. **The Permittee** You 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 you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. **The Permittee** You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after **April 19, 2005** ~~the effective date of 40 CFR Part 63, Subpart PPPP~~, whichever is later. For an existing affected source, **the Permittee** you must submit the initial notification no later than **April 19, 2005** ~~1 year after the effective date of 40 CFR Part 63, Subpart PPPP~~. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. **The Permittee** You 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 your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.4.12 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 Title V permit.

- (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 Title V 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.
- (b) The significant permit modification application shall be submitted no later than **July 19, 2006** ~~twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP~~.
- (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

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

**Company Name: Consolidated Leisure Industries, LLC
Address City IN Zip: 21888 Beck Drive, Elkhart, Indiana 46516
SSM: 039-17691
Pit ID: 039-00192
Reviewer: Edward A. Longenberger
Date: May 2, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
DPB #4																
5-U7-Mix-RTS Basecoat	7.51	87.70%	0.0%	87.7%	0.0%	12.30%	8.00000	0.750	6.59	6.59	39.52	948.42	173.09	6.07	53.55	75%

PM Control Efficiency: 95.00%

State Potential Emissions	Add worst case coating to all solvents	Uncontrolled	39.52	948.42	173.09	6.07
		Controlled	39.52	948.42	173.09	0.303

METHODOLOGY

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

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

**Company Name: Consolidated Leisure Industries, LLC
Address City IN Zip: 21888 Beck Drive, Elkhart, Indiana 46516
SSM: 039-17691
Plt ID: 039-00192
Permit Reviewer: Edward A. Longenberger
Date: May 2, 2003**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Methacrylate	Weight % Glycol Ethers	Weight % O-Cresol	Weight % Ethylbenzene	Weight % Cumene	Xylene Emissions	Toluene Emissions	Methyl Methacrylate Emissions	Glycol Ether Emissions	O-Cresol Emissions	Ethylbenzene Emissions	Cumene Emissions
											(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DPB-4																	
5-U7-Mix-RTS Basecoat	7.51	8.00	0.75	16.00%	30.00%	1.00%	1.00%	1.00%	3.00%	1.00%	7.21	13.52	0.451	0.451	0.451	1.35	0.451

Individual Total	7.21	13.5	0.451	0.451	0.451	1.35	0.451
Overall Total	23.9						

METHODOLOGY

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