INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 22, 2005

RE: Fleetwood Motor Homes of Indiana, Inc #44 / 001-18132-00025

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted 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 1/10/05

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December 22, 2005

Mr. Tim Quinton
Fleetwood Motor Homes of Indiana, Inc., #44
P.O. Box 31
Decatur, Indiana 46733

Re: 001-18132-00025
First Significant Source Modification to:
Part 70 permit No.: T001-17529-00025

Dear Mr. Quinton:

Fleetwood Motor Homes of Indiana, Inc., #44 was issued a Part 70 operating permit T001-17529-00025 on February 15, 2005 for a motor home manufacturing plant. An application to modify the source was received on October 28, 2003. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for modification at the source:

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B, respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Yu-Lien Chu, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Assistant Commissioner
Office of Air Quality

Attachments

ERG/YC

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: T001-17529-00025	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 15, 2005 Expiration Date: February 15, 2010

First Significant Source Modification No.: 001-18132-00025	
Original signed by: Paul Dubenetzky, Assistant Commission Office of Air Quality	Issuance Date: December 22, 2005

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

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

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

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

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booths 3A and 3C, constructed in 1989 and 2003 respectively, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stacks 3A and 3C, respectively.

(d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.

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

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

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

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

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

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

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM: Main Office
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the

permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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

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

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the c change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared written emergency reduction plans (ERPs) consistent with safe operating procedures on May 20, 1998.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 27-19(c)][326 IAC 2-6]

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all require monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present

or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. An deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all records required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booths 3A and 3C, constructed in 1989 and 2003 respectively, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stacks 3A and 3C, respectively.

(d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.

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

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

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

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.

(b) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.

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

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15

does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

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

(a) Pursuant to 40 CFR 63.4481(e)(2) and 40 CFR 63.3881(e)(2), compliance with the emissions limitations specified in 40 CFR 63, Subpart PPPP shall constitute compliance with the requirements of 40 CFR 63, Subpart MMMM for the surface coating operations at this source that apply surface coatings to metal parts.

(b) Pursuant to 40 CFR 63.3881(e)(2)(ii), the usage of surface coatings used to coat metal parts shall be less than 10% of the total of all surface coatings used at the source, measured on a mass of coating solids used basis.

D.1.4 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 2-2-3 (PSD BACT) and 326 IAC 8-1-6, the spray/curing operations (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B) and adhesive application operation 4A doing graphics stripping, logo painting, adhesive application, finish coating, front cap painting, rear cap painting, and skirt painting shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for these operations shall be as follows:

(1) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The VOC content for the coatings as applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.2
Adhesive	3.5

(3) The use of HVLP spray applications or its equivalent for spray coating operations.

(4) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(5) Good work practices to minimize leaks, spills and evaporative losses, which includes, but not limited, to the following:

(A) Storing solvent and solvent soaked rags in closed containers.

(B) Sealing lids on all containers not in use or in storage.

(C) The purging of guns and lines into approved containers.

(D) Maintaining an organized spill response and clean-up operation.

(E) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,

(F) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(G) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

(b) Pursuant to Second Significant Permit Modification 001-14604-00025, issued November 7, 2001, and 326 IAC 8-1-6, the usage of VOC in the coatings delivered to operators in spray/curing booths 4B, 7C and 7D shall be limited to twenty five (25) tons per twelve month consecutive period, with compliance determined on a monthly basis.

D.1.5 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The total coating solids input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, shall be less than 214 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The transfer efficiency of the spray guns shall be no less than 65%.

(c) The control efficiency of the dry filters shall be at least 80%.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators at subassembly painting operations 3A and 3C shall be limited to 3.5 pounds of VOCs per gallon of coating less water, delivered to a coating operator that applies air dried coatings.

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

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 3C, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

D.1.10 Monitoring

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

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.4, D.1.5(a), and D.1.6, 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, the coating solid usage limit, and the VOC content limit established in Conditions D.1.4, D.1.5(a), and D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The coating solid content of each coating material;

(3) The total VOC and coating solid usage for each month;

(4) The weight of VOCs emitted for each compliance period; and

(5) The total coating solid usage for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount and percent solids content of each coating material and solvent used on a

monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. The records shall distinguish between those materials used for coating metal surfaces and those materials used for coating plastic and other surfaces. The records shall show the mass of coating solids used to coat metal surfaces and the mass of coating solids used to coat plastic and other surfaces for each month.

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

D.1.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4(a)(1), D.1.4(b), and D.1.5(a), shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 40 CFR 63.4481(e)(2)(ii), the Permittee shall submit a summary of the information to document compliance with Condition D.1.3 on an annual basis. The Permittee shall submit this report to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms provided at the end of this permit, according to the schedule specified in 40 CFR 63.4520(a).

D.1.13 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.4510(b) no later than April 19, 2005. The Permittee must submit the initial notification required by 40 CFR 63.3910(b) no later than January 2, 2005.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

(d) Pursuant to 40 CFR 63.4481(e)(2), the Permittee shall determine the predominant activity at their facility and submit the results of that determination with the initial notifications required by 40 CFR 63.4510(b), and 40 CFR 63.3910(b).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

(b) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(c) The significant permit modification application shall be submitted no later than July 19, 2006.

The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B
Parameter: VOC usage
Limit: Less than 320 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B
Parameter: Coating Solid usage
Limit: Less than 214 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a
Prevention of Significant Deterioration (PSD) Permit, a
Part 70 Significant Source Modification, and a
Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224 East, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	T001-17529-00025
Operation Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

On August 9, 2005, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Fleetwood Motor Homes of Indiana, Inc., #44 had applied for a Prevention of Significant Deterioration (PSD) Permit, a Part 70 Significant Source Modification, and a Part 70 Significant Permit Modification to increase the VOC input limit for the existing ten (10) paint booths. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 22, 2005, Fleetwood Motor Homes of Indiana, #44 submitted comments on the proposed PSD permit, Significant Source Modification, and Significant Permit Modification. On September 2, 2005, U.S. EPA also submitted comments on this proposed PSD permit, Significant Source Modification, and Significant Permit Modification. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment 1:

The Permittee stated that spray/curing booth 3C was inadvertently left out of Condition D.1.5. 326 IAC 8-2-9 is applicable to spray/curing booth 3C as detailed in SSM 01-14522-00025, issued October 24, 2001 and SPM 01-14604-00025, issued November 7, 2001.

Response to Comment 1:

Booth 3C was permitted to construct in SSM #001-14522-00025 and to operate in SPM #001-14604-00025. According to SSM #001-14522-00025, issued October 24, 2001, the subassembly painting operation 3C has actual VOC emissions greater than 15 lbs/day and is subject to the requirement of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Therefore, Condition D.1.5 has been corrected as follows to include this unit:

D.1.5~~6~~ Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

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

. . .

Comment 2:

U.S. EPA indicated that the potential to emit PM10 of the modified spray booths is greater than 15 tons per year. The Permittee shall apply BACT to control the PM10 emissions from the modified booths or shall take PSD minor limitations to limit the PM10 emissions from the modified booths to less than 15 tons per year.

Response to Comment 2:

In order to render the requirements of 326 IAC 2-2-3 (BACT) not applicable to the modified booths (booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B) for PM10 emissions, an additional coating solid usage limit of less than 214 tons per year has been added to the permit. Based on a transfer efficiency of 65% and a control efficiency of 80% for the dry filters, this coating solid usage limit is equivalent to 15 tons per year of PM10 emissions (214 tons/yr x (1-65%) x (1-80%) = 15.0 tons/yr). In addition, the requirement to operate dry filters while the modified spray booths are in operation is federally enforceable. A PSD minor limit, the corresponding recordkeeping and reporting requirements, and an additional quarterly reporting form have been added to the permit as follows:

D.1.5 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The total coating solids input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, shall be less than 214 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The transfer efficiency of the spray guns shall be no less than 65%.

(c) The control efficiency of the dry filters shall be at least 80%.

D.1.6~~7~~ Particulate [326 IAC 6-3-2(d)]

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

D.1.8~~9~~ Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.4 and D.1.5~~6~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.4**,** ~~and~~ D.1.5**(a)**, **and D.1.6,** the Permittee shall maintain records in accordance with (1) through (~~3~~**5**) below. Records maintained for (1) through (~~3~~**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~~ **the coating solid**

usage limit, and the VOC content limit established in Conditions D.1.4**,** ~~and~~ D.1.5**(a), and D.1.6**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used**;**

(2) The coating solid content of each coating material;

(~~2~~**3**) The total VOC **and coating solid** usage**s** for each month; ~~and~~

(**34**) The weight of VOCs emitted for each compliance period**; and**

(5) The total coating solid usage for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections**.** ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~

. . .

D.1.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4(a)(1)**,** ~~and~~ D.1.4(b)**, and D.1.5(a),** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: **Fleetwood Motor Homes of Indiana, Inc., # 44**
Source Address: **1031 U.S. 224 East, Decatur, Indiana 46733**
Mailing Address: **P.O. Box 31, Decatur, Indiana 46733**
Part 70 Permit No.: **T001-17529-00025**
Facility: **Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B**
Parameter: **Coating Solid usage**
Limit: **Less than 214 tons per twelve (12) month consecutive period with compliance determined at the end of each month.**

YEAR:_____

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

Month 2			
Month 3			

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:_____

Submitted by: _____
Title / Position:_____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 3:

U.S EPA commented that the VOC content limit for the base coat (6.5 lbs/gal) is high compared to the RACT limits for many surface coating processes.

Response to Comment 3:

The VOC content limit for the base coat in the draft permit (6.5 lbs/gal) is greater than the BACT limit of 6.2 lbs/gal for base coat established in CP #039-12002-00536 (issued on July 7, 2000) for Dynamax, Corp. In order to be consistent with the BACT determination for similar processes, the VOC content limit for base coat in Condition D.1.4(a)(2) has been revised to 6.2 lbs/gal. Therefore, Condition D.1.4 has been revised as follows:

D.1.4 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 2-2-3 (PSD BACT) and 326 IAC 8-1-6, the spray/curing operations (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B) and adhesive application operation 4A doing graphics stripping, logo painting, adhesive application, finish coating, front cap painting, rear cap painting, and skirt painting shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for these operations shall be as follows:

. . .

(2) The VOC content for the coatings **as** applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	~~6.5~~ **6.2**
Adhesive	3.5

. . .

Upon further review, the OAQ has decided to make the following revisions to the permit.

1. The permit number listed in the header of the Significant Source Modification #001-18132-00025 has been corrected as follows:

1st Significant Source Modification No.: 001-~~18232~~**18132**-00025

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, the PMP recordkeeping requirements in Section D have been removed from the permit. In addition, Conditions B.10 – Preventive Maintenance and B.11 – Emergency Provisions have been revised as follows:

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

. . .

~~(b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

(~~c~~**b**) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP**s** do~~es~~ not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~d~~**c**) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

. . .

(e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions.** However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

. . .

D.1.11 Record Keeping Requirements

. . .

(b) To document compliance with Condition~~s D.1.8 and~~ D.1.10, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections~~, and those additional inspections prescribed by the Preventive Maintenance Plan~~.

. . .

3. For clarification purposes, Condition B.19 – Operational Flexibility has been revised as follow:

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

. . .

(3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

. . .

(5) The Permittee maintains records on-site ~~which document~~, on a rolling five (5) year basis, **which document** all such changes and emissions ~~trading~~ **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e)**. The Permittee shall make** ~~and makes~~ such records available, upon reasonable request, for public review.

4. Upon further review, IDEM has determined to remove Condition C.6 - Operation of Equipment because the requirements in this condition have been included in Section D. Remaining conditions have been renumbered as necessary.

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

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

5. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to Conditions C.15 and D.1.10:

C.~~15~~**14** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or

exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

D.1.10 Monitoring

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

(b) Monthly inspections shall be performed of the coating emissions from the stack**s** 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 w~~**W**hen **there is** a noticeable change in overspray emission**s**, or **when** evidence of overspray emission is observed**, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances**. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

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

6. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained these requirements, and Condition D.1.6 which contained these requirements has been removed. Since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statements from C.1 have been removed. Condition C.1 and D.1.6 have been revised as follows to reflect the above changes:

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

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

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

~~D.1.6 Particulate Emissions [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, 3C, 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) and the shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Prevention of Significant Deterioration (PSD) Permit, a Part 70 Significant Source Modification, and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224 East, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	T001-17529-00025
Operation Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Fleetwood Motor Homes of Indiana, Inc., #44, relating to the modification of the following emission units and pollution control devices:

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B, respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

History

Fleetwood Motor Homes of Indiana, Inc., #44 is an existing motor home manufacturing plant and their Part 70 permit renewal (T001-17529-00025) was issued on February 15, 2005. Pursuant to T001-17529-00025, issued on February 15, 2005, the VOC usage for all the coating operations at this source is limited to less than 244 tons/yr. Combined with the VOC emissions from the insignificant activities, the VOC emissions from the entire source are less than 250 tons/yr. The potential to emit PM and all other criteria pollutants at this source is also limited to less than 250 tons/yr. Therefore, this source is an existing PSD minor source.

On October 28, 2003, the Permittee submitted an application to the IDEM, OAQ requesting to increase the VOC usage limit for the existing spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B to 320 tons/yr due to the increase in painting surface area for each motor coach and an increase in work shifts. Since a modification which increases the PTE of VOC for these units to greater than 250 tons/yr is subject to the requirements of 326 IAC 2-2, a PSD permit is required for this modification.

The Permittee also requested a revision to the existing BACT for the modified booths. Pursuant to CP #01-11-93-0137 (issued on December 1, 1989), SPM #001-12860-00025 (issued on October 19, 2001), and 326 IAC 8-1-6 (BACT), the BACT for spray/curing booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B, and adhesive application operation 4A was determined to be the following:

(a) The VOC usage per motor home shall be limited dependent upon the size of the motor home being produced as follows:

Motor home type	Motor home length	Pounds of VOC per motor home (monthly average)
Small	30 feet long or less	73
Large	greater than 30 feet long but less than or equal to 45 feet long	111.5

(b) Use of air atomization spray application.

(c) Utilization of low VOC coatings.

(d) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.

The Permittee requested revisions to the BACT limits for the modified booths from VOC usage limits for each vehicle to VOC content limits for the coatings. This change is consistent with the most recent BACT determinations for motor home painting operations.

In an e-mail received on July 29, 2005, the Permittee indicated that the existing subassembly paint booth 3C was omitted from the TV renewal permit T001-17529-00025, issued on February 15, 2005. This paint booth was permitted to construct in SSM# 001-14522-00025 (issued on October 24, 2001) and to operate in SPM# 001-14604-00025 (issued on November 7, 2001). The Permittee stated that this booth was constructed in 2003 and should be included in the revised permit. Therefore, the unit description in Condition A.2 and Section D.3 for the existing subassembly painting operation has been revised to include the existing booth 3C.

Upon further review, IDEM, OAQ made the following changes:

(a) Since the potential to emit VOC from the entire source will be greater than 250 tons/yr, this source will become a PSD major source after this modification. The Source Status in Condition A.1 – General Information has been revised.

(b) Condition B.24 – Credible Evidence has been revised to reflect the updated language for this condition.

(c) The mailing address for IDEM, OAQ has been changed as follows:

100 North Senate Avenue~~, P.O. Box 6015~~
Indianapolis, Indiana 4620**4**~~6-6015~~

This change has been made throughout the whole permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the PSD permit, the Part 70 Significant Source Modification and the Part 70 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 October 28, 2003. Additional information was received on December 18, 2003, December 29, 2003, January 13, 2004, January 14, 2004, May 31, 2005, July 29, 2005, and August 1, 2005.

Emission Calculations

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

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	90.9
PM10	90.9
SO_2	--
VOC	500
CO	--
NO_x	--

HAP's	Potential To Emit (tons/year)
Ethylbenzene	28.7
Xylene	165
Glycol Ethers	5.74
Toluene	1.42
Hexane	2.94
TOTAL	199

Justification for Modification

This modification is being performed through a Part 70 Significant Source Modification because: (1) this is a modification subject to 326 IAC 2-2(PSD) pursuant to 326 IAC 2-7-10.5(f)(1); (2) the potential to emit of this modification is greater than 25 tons/yr for PM, PM10, and VOC pursuant to 326 IAC 2-7-10.5(f)(4); (3) the potential to emit of this modification is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs pursuant to 326 IAC 2-7-

10.5(f)(6); and (4) this is a modification subject to 326 IAC 8-1-6 pursuant to 326 IAC 2-7-10.5(f)(2).

The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this modification involves changes in a Part 70 permit condition that the source had assumed to avoid 326 IAC 2-2 (PSD) requirements.

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM10	attainment
PM2.5	attainment or unclassifiable
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

(b) Adams County has been classified as unclassifiable or attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions.

(c) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	8
PM10	8
SO_2	0
VOC	233
CO	12
NOx	2

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions are based upon the emission inventory for this source in 2003.

Potential to Emit of Modification After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
PTE of the Modified Spray Booths (2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B)	Less than 18.2	Less than 18.2	--	Less than 320	--	--	165 for a single HAP and 199 for total HAPs
PSD Significant Thresholds	250	250	250	250	250	250	NA

(a) This modification to an existing minor stationary source is major. The modified spray booths (booth 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B) were constructed in 1989 and the VOC emissions from these units were limited to less than 250 tons/yr in OP #01-11-93-0137, issued on December 1, 1989, which rendered the requirements of 326 IAC 2-2 (PSD) not applicable. Since the source requested to increase the total VOC emission limit for these units to greater than 250 tons/yr, these spray booths are now subject to the requirements of 326 IAC 2-2(PSD).

(b) The entire source will become a PSD major source after this modification because the potential to emit VOC of the entire source will be greater than 250 tons/yr.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The coating operations in the modified spray booths apply coatings to the body of motor homes, which are made of a plastic substance. Therefore, the coating operations of this modification are not subject to the requirements of the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM).

(c) The coating operations in the modified spray booths apply coatings to plastic surfaces and the existing source is a HAP major source. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Productions (40 CFR 63.4480 - 63.4581, Subpart PPPP) is applicable.

This modification is not a reconstruction as defined in 40 CFR 63.2. Therefore, this source is considered an existing HAP major source for 40 CFR 63, Subpart PPPP. Pursuant to 40 CFR 63.4483(b), an existing source shall comply with 40 CFR 63, Subpart PPPP by August 29, 2006. The requirements of this NESHAP have been included in the Permittee's Title V renewal permit (T001-17529-00025, issued on February 15, 2005).

(d) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:

(1) With the potential to emit before controls equal to or greater than the major source threshold;

(2) That is subject to an emission limitation or standard; and

(3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

State Rule Applicability - Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B

326 IAC 2-2 (PSD)

Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed in 1989 and will be modified in 2005. Pursuant to CP #01-11-93-0137, issued on December 1, 1989 and T001-17529-00025, issued on February 15, 2005, the VOC usage for all the coating operations at this source is limited to less than 244 tons/yr. Therefore, the construction of these spray booths was not subject to the requirements of 326 IAC 2-2 (PSD).

Since the Permittee requested to increase the VOC input limit for these booths to greater than 250 tons/yr, the requirements of 326 IAC 2-2 (PSD) will be applicable to these booths. Pursuant to 326 IAC 2-2-3 (PSD), the Permittee shall comply with the following requirements for this modification:

(a) The VOC emissions from booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B shall be controlled with the Best Available Control Technology (BACT), pursuant to 326 IAC 2-2-3;

(b) An air quality analysis shall be performed, pursuant to 326 IAC 2-2-4;

(c) An air quality impact analysis shall be performed, pursuant to 326 IAC 2-2-5; and

(d) Additional analysis, such as energy, economy, soil, and vegetation impact analysis shall be performed, pursuant to 326 IAC 2-2-7.

A copy of the BACT analysis can be found in Appendix B and a copy of the additional analysis can be found in Appendix E. Since the VOC increase from this modification is less than 250 tons/yr (320 tons/yr - 105 tons/yr [actual VOC emissions in 2002] = 215 tons/yr), the air quality analysis and the air quality impact analysis are not required for the VOC emissions from this modification. However, this modification is subject to the requirements of 326 IAC 2-2 (PSD) and has potential to emit HAP greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. Therefore, the Permittee is required to perform an air quality analysis for HAPs, pursuant to 326 IAC 2-2-4. A copy of the air quality analysis can be found in Appendix D.

326 IAC 2-4.1 (New Source Toxic Control)

Spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed in 1988 and modified in 2005. The potential to emit HAP from these booths is greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. However, these booths are subject to 40 CFR 63, Subpart PPPP (NESHAP for Surface Coating of Plastic Parts and Productions), which was promulgated on August 29, 2003. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed after 1980 and each of them has potential VOC emissions greater than 25 tons/yr. In addition, there are no other applicable 326 IAC 8 rules that apply to these plastic coating operations. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are applicable to these spray booths.

The BACT for these booths was determined in OP #01-11-93-0137, issued on December 1, 1989 and revised in SPM #001-12860-00025, issued on October 19, 2001. Pursuant to SPM #001-12860-00025, issued on October 19, 2001, the BACT for these spray booths was determined to be VOC usage limits for each motor home, the use of air atomized spray applications, and good work practice.

The Permittee requested revisions to the existing BACT for these spray booths in order to be consistent with the current BACT determinations for this industry. A revised BACT analysis was submitted by the Permittee on October 28, 2003 and additional information was received on December 18, December 22, 2003, and May 31, 2005. A summary of the BACT analysis is provided in Appendix B. IDEM, OAQ has reviewed the analysis and has determined that the following requirements are the BACT for spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B:

(a) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC content for the coatings applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.5
Adhesive	3.5

(c) The use of HVLP spray applications or its equivalent for spray coating operations.

(d) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(e) Good work practices to minimize leaks, spills and evaporative losses, which include, but are not limited to, the following:

(1) Storing solvent and solvent soaked rags in closed containers.

(2) Sealing lids on all containers not in use or in storage.

(3) The purging of guns and lines into approved containers.

(4) Maintaining an organized spill response and clean-up operation.

(5) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,

(6) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(7) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

326 IAC 6-3-2 (Process Operations)

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 requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, remains an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B 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:

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

Under the rule revision, particulate from these spray booths shall be controlled by dry filters, or equivalent control devices, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This source currently uses dry filters to control overspray. Therefore, spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B are in compliance with 326 IAC 6-3-2.

Compliance Requirements

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

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

The Compliance monitoring requirements applicable to the modification are as follows:

1. Spray booths 2A, 2B, 2C, 2D, 3B, 4A 6A, 6B, 7A, 7B, and 7C have applicable compliance monitoring conditions as specified below:

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

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

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

These monitoring conditions are necessary because these spray booths must operate properly to ensure compliance with 40 CFR 52, Subpart P.

Proposed Changes

The Table of Contents has been changed as necessary. Bold language has been added, language with a line through it has been deleted.

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 manufacturing plant.

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

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

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

…

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth**s** 3A **and 3C**, constructed in 1989 **and 2003 respectively**, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack**s** 3A and **3C, respectively**.

. . .

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] **[326 IAC 1-1-6]**

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth**s** 3A **and 3C**, constructed in 1989 **and 2003 respectively**, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack**s** 3A and **3C, respectively**.

(d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.

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

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

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

D.1.~~5~~**4** Volatile Organic Compounds (VOC) BACT Limits **[326 IAC 2-2-3]** [326 IAC 8-1-6]

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

~~(1) The VOC usage per motor home shall be dependent upon the size of the motor home produced as follows:~~

~~(A) Small (30 foot long or less) motor homes shall be limited to a monthly average of 73 pounds of VOC per motor home.~~

~~(B) Large (greater than 30 foot long but less than or equal to 45 foot long) motor homes shall be limited to a monthly average of 111.5 pounds of VOC per motor home.~~

~~(2) Use of air atomization spray application equipment.~~

~~(3) Utilization of low VOC coatings.~~

~~(4) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.~~

(1) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The VOC content for the coatings applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.5
Adhesive	3.5

(3) The use of HVLP spray applications or its equivalent for spray coating operations.

(4) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(5) Good work practices to minimize leaks, spills and evaporative losses, which includes, but not limited, to the following:

(A) Storing solvent and solvent soaked rags in closed containers.

(B) Sealing lids on all containers not in use or in storage.

(C) The purging of guns and lines into approved containers.

(D) Maintaining an organized spill response and clean-up operation.

(E) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,

(F) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(G) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

. . .

D.1.~~6~~**5** Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.1.~~7~~**6** Particulate Emissions [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, **3C,** 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) and the shall not exceed the pound per hour emission rate established as E in the following formula:

…

D.1.~~8~~**7** Particulate [326 IAC 6-3-2(d)]

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

D.1.~~9~~**8** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.1.~~10~~**9** Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.~~11~~**10** Monitoring

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

…

D.1.~~12~~**11** Record Keeping Requirements

(a) To document compliance with Conditions D.1. 4 **and** ~~,~~ D.1.5 ~~and D.1.6~~, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4 **and** ~~,~~ D.1.5 ~~and D.1.6~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The total VOC usage for each month; and

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

(b) To document compliance with Conditions D.1.~~9~~**8** and D.1.~~11~~**10**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

. . .

D.1.~~13~~**12** Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4**(a)(1)**~~, D.1.5~~ and D.1.6**4(b)** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

. . .

D.1.~~14~~**13** Notification Requirements [40 CFR 63.4510]

D.1.~~15~~**14** 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: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: Spray Booths 2A, 2B, 2C, 2D, ~~3A,~~ 3B, 4A, ~~4B,~~ 6A, 6B, 7A, **and** 7B, ~~7C and 7D.~~
Parameter: VOC usage
Limit: Less than ~~244~~ **320** tons per twelve **(12)** month consecutive period, with compliance determined at the end of each month.

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

~~**Part 70 Quarterly Report**~~

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

~~YEAR:_____~~

~~Month~~	~~Column 1~~		~~Column 2~~	~~Column 2/Column 1~~
	~~Number of Motor Homes~~		~~Total Amount of VOC (lbs)~~	~~Amount of VOC per Motor Home (lbs)~~
	~~Small~~	~~Large~~		
~~Month 1~~				
~~Month 2~~				
~~Month 3~~				

~~☐ No deviation occurred in this quarter.~~

~~☐ Deviation/s occurred in this quarter.~~

~~Deviation has been reported on:~~ _____

~~Submitted by:~~ _____
~~Title / Position:~~ _____
~~Signature:~~ _____
~~Date:~~ _____
~~Phone:~~ _____

~~Attach a signed certification to complete this report.~~

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-18132-00025. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 001-18299-00025.

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B

Company Name: Fleetwood Motor Homes of Indiana, Inc. #44
Address: 1031 U.S. 224 E, Decatur, Indiana 46733
SSM: 001-18132-00025
Reviewer: ERG/YC
Date: July 29, 2005

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	*Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	**PTE of PM/PM10 before Control (lbs/hr)	**PTE of PM/PM10 before Control (ton/yr)	***Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)
Clear Coat	8.07	43.4%	0.0%	43.4%	1.2	6.77	3.50	28.5	683	125	13.0	56.9	65%	80%	2.60	11.4
Base Coat	7.60	80.2%	0.0%	80.2%	1.2	11.6	6.10	84.8	2,036	372	7.33	32.1	65%	80%	1.47	6.42
Adhesive	7.51	43.7%	0.0%	43.7%	1.2	0.24	3.28	0.95	22.7	4.14	0.43	1.87	65%	80%	0.09	0.37
Total								**114**		**500**	**20.7**	**90.9**			**4.15**	**18.2**

* The maximum usages for clear coat and for base coat are the total usages in booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B. The maximum usage for adhesive usage is the usage in booth 4A.

**Assume all the PM emissions are PM10 emissions.

*** HVLP application method is used in this booth. The transfer efficiency is from an HVLP document prepared by BINKS.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lbs)
PTE of PM/PM10 after Control (lbs/hr) = PTE of PM/PM10 before Control (lbs/hr) * (1 - PM/PM10 Control Efficiency)
PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B

Company Name: Fleetwood Motor Homes of Indiana, Inc. #44
Address: 1031 U.S. 224 E, Decatur, Indiana 46733
SSM: 001-18132-00025
Reviewer: ERG/YC
Date: July 29, 2005

Material	Density (lbs/gal)	*Maximum Usage (gal/unit)	Maximum Throughput (unit/hr)	Weight % Ethylbenzene	PTE of Ethylbenzene (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % Glycol Ethers	PTE of Glycol Ethers (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)	Weight % Hexane	PTE of Hexane (tons/yr)
Clear Coat	8.07	6.77	1.2	0.30%	0.86	1.00%	2.87	2.00%	5.74	0.00%	0.00	0.00%	0.00
Base Coat	7.60	11.6	1.2	6.00%	27.8	34.0%	158	0.00%	0.00	0.00%	0.00	0.00%	0.00
Adhesive	7.51	0.24	1.2	0.00%	0.00	0.00%	0.00	0.00%	0.00	15.0%	1.42	31.0%	2.94
Total					**28.7**		**160**		**5.74**		**1.42**		**2.94**

* The maximum usages for clear coat and for base coat are the total usages in booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B. The maximum usage for adhesive usage is the usage in booth 4A.

Total HAPs = 199 tons/yr

METHODOLOGY
PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Throughput (unit/hr) x Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix B
Best Available Control Technology (BACT) Determinations

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224E, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operating Permit No.:	T001-17529-00025
Operating Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for a Prevention of Significant Deterioration Permit (PSD) permit, a Part 70 Significant Source Modification, and a Part 70 Significant Permit Modification to an existing motor home manufacturing plant, owned and operated by Fleetwood Motor Homes of Indiana, Inc., #44 (referred to as AFleetwood@), located at 1031 U.S. 224 E, Decatur, Indiana 46733. This modification includes an increase in VOC usage limit for the following emission units:

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

Pursuant to Construction Permit #01-11-93-0137 (issued on December 1, 1989) and T001-17529-00025 (issued February 15, 2005), the VOC input to all the surface coating operations at this source is limited to less than 244 tons/yr. Combined with the VOC emissions from other insignificant units, the VOC emissions from the entire source are limited to less than 250 tons/yr. Therefore, this existing source is a minor source for PSD. On October 28, 2003, Fleetwood submitted an application to the IDEM, OAQ requesting to increase the total VOC usage limit to 320 tons/yr for the existing spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B. The Permittee stated that this change is due to the increase in customers= demand for full body painting, instead of part of the vehicle painting, and the increase in work shifts. These are no physical changes required for this modification.

Since the potential to emit VOC for these booths will be greater than 250 tons/yr after this modification, these booths are now subject to the requirements of 326 IAC 2-2 (PSD). Pursuant to 326 IAC 2-2-3, the Permittee shall apply Best Available Control Technologies (BACT) to control the VOC emissions from these booths.

In addition, booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed after 1980 and each of them has potential VOC emissions greater than 25 tons/yr. There are no other applicable 326 IAC 8 rules that apply to these plastic coating operations. Therefore, these booths are also subject to the requirements of 326 IAC 8-1-6 (BACT). The BACT requirements for these booths have been determined in SPM #001-12860-00025, issued on October 19, 2001 and included in their Part 70 permit (T001-17529-00025, issued February 15, 2005). The Permittee requested to revise the BACT limits for these spray booths, in order to be consistent with the most recent BACT determinations for motor home painting operations.

IDEM, OAQ conducts BACT analyses in accordance with the "Top-Down" Best Available Control Technology process, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

(a) Identify all potentially available control options;
(b) Eliminate technically infeasible control options;
(c) Rank remaining control technologies by control effectiveness;
(d) Evaluate the most effective controls and document the results as necessary; and
(e) Select BACT.

In accordance with EPA guidance, the BACT analysis should take into account the energy, environmental, and economic impacts. Emission reductions may be achieved through the application of available control techniques, changes in process design, and/or operational limitations. These BACT determinations are based on the following information:

(a) The BACT analysis information submitted by Fleetwood on October 28, 2003 and the additional information submitted on December 18, 2003, December 22, 2003, and May 31, 2005;

(b) Information from vendors/suppliers;

(c) The EPA RACT/BACT/LAER (RBLC) Clearinghouse;

(d) State and local air quality permits; and

(e) The background document for NESHAP, Subpart PPPP - Determination of Maximum Achievable Control Technology (MACT) Floor for New and Existing Sources in the Assembled On-Road Vehicle Subcategory of the Plastic Parts and Products Surface Coating Source Category, dated October 10, 2002.

VOC BACT

The VOC emissions generated from each of the spray booths are the VOC emitted from the coating and adhesive drying process, and the coating associated activities, such as surface preparation, cleaning, mixing, and storage. The substance being painted by spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B are the plastic sidewalls of motor homes, which have dimensions of 733 ft^2 for sidewall area, 101 ft^2 for front and rear area, 134 ft^2 for endwall area, and 65 ft^2 for roof components.

Step 1 - Identify Control Options

The following available technologies were identified and evaluated to control VOC emissions from the motor home painting operations:

(a) The search for the motor home paining operation in EPA's RACT/BACT/LAER Clearinghouse (RBLC) and Indiana Air Permits identified the following:

Company	PBLD ID or Permit #	Date Issued and State	Type of Operation	BACT Requirements
Monaco Coach Corp.	SSM# 039-15620-00017	12/11/02 (IN)	Motor Home Painting	VOC content limits (< 6.5 lbs/gal for cleaner/thinner; < 3.5 lbs/gal for primers; < 6.5 lbs/gal for basecoat; < 3.5 lbs/gal for clear coats; < 3.5 lbs/gal for sealers; < 4.5 lbs/gal for averaged basecoat and clear coat). Good housekeeping practice. Air-atomized spray applications. Hand-wiped cleaning for exteriors before painting. Waste solvent recycling. Use waterbone undercoats. VOC usage limit (< 539 tons/yr).
CDI, LLC	IA-0065	09/16/02 (IA)	Motor Home Painting	VOC usage limit (< 80 tons/yr).
Newmar Corp.	SSM #039-14882-00157	02/19/02 (IN)	Motor Home Painting	VOC usage limit (< 138.28 tons/yr). Hand-wiped cleaning for exteriors before painting. HVLP spray equipment for painting operations. Air atomized application for paint repair.
Fleetwood Motor Homes of Indiana, Inc., #44	SPM# 001-12860-00025	10/29/01 (IN)	Motor Home Painting	VOC usage limits (< 73 lbs/unit for small units and < 111.5 lbs/unit for large unit). Air-atomized spray applications. Low VOC coatings. Pollution prevention techniques.
Dynamax Corp.	CP #039-12002-00536	07/07/00 (IN)	Motor Home Painting	VOC contents limits (< 6.2 lbs/gal for basecoat; < 4.4 lbs/gal for clearcoat; < 1.8 lbs/gal for undercoat). HVLP spray equipment for painting operations. Air-assisted airless or airless applications for adhesive application. Good house keeping practice.
Gulf Stream Coach, Inc.	CP #039-9271-00145	12/23/98 (IN)	Motor Home Painting	VOC contents limits (< 5.64 lbs/gal for primer/sealer; < 6.29 lbs/gal for basecoat; < 4.45 lbs/gal for topcoat). HVLP spray equipment for painting operations. Work practice. VOC usage limit (< 129 tons/yr)

(b) The search for the motor home painting operation in South Coast Air Quality Management District (AQMD) Air Permits identified the following:

Company	Permit #	Date Issued and State	Type of Operation	Requirements
Fleetwood Motor Homes, Riverside	CP #407612	12/24/03 (CA)	Motor Home Painting	Thermal oxidizers at 98% control efficiency VOC < 5.1 tons/yr

(c) Fleetwood also evaluated a variety of control technologies, including the following:

(1) The use of waterborne coatings;

(2) The use of high solid (low VOC) coatings (Currently Used);

(3) Regenerative Thermal Oxidation (RTO);

(4) Rotor Concentrator/RTO Combinations;

(5) Regenerative Catalytic Oxidation;

(6) Carbon Adsorption with Zeolite Absorption;

(7) High Efficiency Spray Applicators (Currently Used); and

(8) Good Work Practice Standards (Currently Used).

Step 2 - Eliminate Technically Infeasible Control Options

Based on the results from the RBLC and state permit database search, vendor review, and an evaluation of the control technologies, IDEM, OAQ has determined that the use of waterborne coatings and carbon adsorption with zeolite absorption are not technically feasible options for this source for the following reasons:

(a) The waterborne coatings could not provide the production quality demanded by the consumers since the waterborne coatings do not retain their color as well as the solvent based coatings.

(b) Carbon adsorption does not work effectively when more than one VOC is present in the waste stream. Disadvantages for using this control option include thermal requirements to purge the zeolite, high-pressure drop across the system and the susceptibility of the zeolite to contamination or fouling.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible approaches for controlling VOC emissions from facilities that have a VOC PTE comparable in magnitude to the motor home painting operations at this source are:

Options for VOC Control	VOC Destruction Efficiency (%)
Regenerative Thermal Oxidizer (RTO)	98%
Regenerative Catalytic Oxidation	98%
Rotor Concentrator with Thermal Oxidizer	95%
Low VOC Coatings, High Efficiency Spray Technologies, and Good Work Practice Standards	(NA)

Step 4 - Evaluate the Most Effective Controls and Document Results

Fleetwood provided IDEM, OAQ with a thorough economic analysis of the technically feasible control options. The analysis estimated the cost of the VOC control equipment, including the initial capital cost of the various components intrinsic to the complete system, and the estimated annual operating costs. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor=s quoted prices. Annualized costs were developed based on information from the vendors and a literature review. The analysis assumed an interest rate of 7% and an equipment life of 10 years.

The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. Note that the cost effectiveness of each option only accounts for the portion of VOC removed by the add-on controls. The Permittee currently dries the painted motor homes outside the spray booths. According to the bench-scale testing performed by the coating supplier on October 26, 2004, less than 50% of VOC that is ultimately volatilized is emitted in the paint booth before the motor home is removed from the booth. Therefore, the Permittee proposed to use a capture efficiency of 50% for VOC in their cost effectiveness analysis. Permittee stated that the price quotes for the control equipment do not include the cost of the heat recovery systems. Therefore, the heat recovery credits were not included in this cost effectiveness analysis. In addition, the heat recovery credits do not have a significant impact on the result of this cost effectiveness analysis (less than 5%).

There are relatively negligible costs associated with the low VOC coatings, high efficiency spray technologies, and good work practice standards because they are currently used at this source. A complete breakdown of the costs associated with the Regenerative Thermal Oxidizer (RTO) and the RTO with concentrator is included in Appendix C. The cost analysis for catalytic oxidizers was not provided by the Permittee because it generally costs more to operate a catalytic oxidizer than a RTO or a RTO with concentrators. A summary of the cost figures determined in the analysis is provided in the table below:

Option	Equipment Cost ($)	Total Operating Cost ($/yr)	Total Annualized Costs ($/yr)	Potential VOC removal (ton/yr)	Cost Effectiveness ($/ton VOC removed)
Regenerative Thermal Oxidizer (RTO) (49.0% overall reduction*)	$3,948,740	$3,204,519	$4,106,662	157	$26,190
Regenerative Catalytic Oxidizer	NA	NA	NA	NA	greater than $26,190
Rotor Concentration with Thermal Oxidize (47.5% overall reduction*)	$4,800,000	$679,442	$1,889,786	152	$12,433
Low VOC Coatings , High Efficiency Spray Technologies, and Good Work Practice Standards	NA	NA	NA	NA	NA

*Note: Overall Reduction Efficiency = Control Efficiency x Capture Efficiency (50%)

Step 5 - Select BACT

IDEM, OAQ has determined that the add-on VOC control equipment is not required for this modification project based on the following reasons:

(a) Based on the results for searching the EPA=s RACT/BACT/LAER Clearinghouse (RBLC) database and Indiana Air Permits, no surface coating spray booths with the similar flow rates were required to install add-on control devices for VOC control as the BACT for the spray booths.

(b) The permit data base search shows that Fleetwood at Riverside, California is currently controlled by a 98% thermal oxidizer. The Permittee stated that the Fleetwood Riverside plant is a newly constructed facility and paint booths at this source were designed to be completely enclosed. The paint booths at Riverside plant can also serve as curing ovens by increasing the temperature at the paint booths. The motor coaches are painted and dried at the same booth. However, the Fleetwood Decatur plant in Indiana is an existing plant and has a different process flow. The painted coach is removed from the paint booth immediately and is allowed to dry in a large open area.

The Permittee stated this modification is to increase the paint usage limit in the existing paint booths and to increase the work shifts. The Permittee does not plan to make physical changes to these existing booths. In order to install an add-on control device, the Permittee would need to either enclose the drying area or to keep the painted motor coaches in the paint booths for a longer time period to completely dry the paints. Due to the size of the existing drying area, the Permittee claimed that the cost to enclose the existing drying area is significant for this source. Keeping the painted coaches in the paint booths for a longer time period until the painted coaches dry will reduce the production rate at this source.

(c) Without physical changes to the existing paint booths and drying area, the installation of a thermal oxidizer with a rotor concentrator is considered economically infeasible ($12,433 per ton of VOC removed).

In order to be consistent to the recent BACT issued to other motor home painting facilities in Indiana, IDEM, OAQ has determined to revise the BACT requirements for booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B at this source to be as follows:

(a) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC content for the coatings applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.5
Adhesive	3.5

(c) The use of HVLP spray applications or its equivalent for spray coating operations.

(d) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(e) Good work practices to minimize leaks, spills and evaporative losses, which includes, but not limited, to the following:

(1) Storing solvent and solvent soaked rags in closed containers.

(2) Sealing lids on all containers not in use or in storage.

(3) The purging of guns and lines into approved containers.

(4) Maintaining an organized spill response and clean-up operation.

(5) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks.

(6) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(7) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Prevention of Significant Deterioration (PSD) Permit, a Part 70 Significant Source Modification, and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224 East, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	T001-17529-00025
Operation Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Fleetwood Motor Homes of Indiana, Inc., #44, relating to the modification of the following emission units and pollution control devices:

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B, respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

History

Fleetwood Motor Homes of Indiana, Inc., #44 is an existing motor home manufacturing plant and their Part 70 permit renewal (T001-17529-00025) was issued on February 15, 2005. Pursuant to T001-17529-00025, issued on February 15, 2005, the VOC usage for all the coating operations at this source is limited to less than 244 tons/yr. Combined with the VOC emissions from the insignificant activities, the VOC emissions from the entire source are less than 250 tons/yr. The potential to emit PM and all other criteria pollutants at this source is also limited to less than 250 tons/yr. Therefore, this source is an existing PSD minor source.

On October 28, 2003, the Permittee submitted an application to the IDEM, OAQ requesting to increase the VOC usage limit for the existing spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B to 320 tons/yr due to the increase in painting surface area for each motor coach and an increase in work shifts. Since a modification which increases the PTE of VOC for these units to greater than 250 tons/yr is subject to the requirements of 326 IAC 2-2, a PSD permit is required for this modification.

The Permittee also requested a revision to the existing BACT for the modified booths. Pursuant to CP #01-11-93-0137 (issued on December 1, 1989), SPM #001-12860-00025 (issued on October 19, 2001), and 326 IAC 8-1-6 (BACT), the BACT for spray/curing booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B, and adhesive application operation 4A was determined to be the following:

(a) The VOC usage per motor home shall be limited dependent upon the size of the motor home being produced as follows:

Motor home type	Motor home length	Pounds of VOC per motor home (monthly average)
Small	30 feet long or less	73
Large	greater than 30 feet long but less than or equal to 45 feet long	111.5

(b) Use of air atomization spray application.

(c) Utilization of low VOC coatings.

(d) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.

The Permittee requested revisions to the BACT limits for the modified booths from VOC usage limits for each vehicle to VOC content limits for the coatings. This change is consistent with the most recent BACT determinations for motor home painting operations.

In an e-mail received on July 29, 2005, the Permittee indicated that the existing subassembly paint booth 3C was omitted from the TV renewal permit T001-17529-00025, issued on February 15, 2005. This paint booth was permitted to construct in SSM# 001-14522-00025 (issued on October 24, 2001) and to operate in SPM# 001-14604-00025 (issued on November 7, 2001). The Permittee stated that this booth was constructed in 2003 and should be included in the revised permit. Therefore, the unit description in Condition A.2 and Section D.3 for the existing subassembly painting operation has been revised to include the existing booth 3C.

Upon further review, IDEM, OAQ made the following changes:

(a) Since the potential to emit VOC from the entire source will be greater than 250 tons/yr, this source will become a PSD major source after this modification. The Source Status in Condition A.1 – General Information has been revised.

(b) Condition B.24 – Credible Evidence has been revised to reflect the updated language for this condition.

(c) The mailing address for IDEM, OAQ has been changed as follows:

100 North Senate Avenue~~, P.O. Box 6015~~
Indianapolis, Indiana 4620**4**~~6-6015~~

This change has been made throughout the whole permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the PSD permit, the Part 70 Significant Source Modification and the Part 70 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 October 28, 2003. Additional information was received on December 18, 2003, December 29, 2003, January 13, 2004, January 14, 2004, May 31, 2005, July 29, 2005, and August 1, 2005.

Emission Calculations

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

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	90.9
PM10	90.9
SO_2	--
VOC	500
CO	--
NO_x	--

HAP's	Potential To Emit (tons/year)
Ethylbenzene	28.7
Xylene	165
Glycol Ethers	5.74
Toluene	1.42
Hexane	2.94
TOTAL	199

Justification for Modification

This modification is being performed through a Part 70 Significant Source Modification because: (1) this is a modification subject to 326 IAC 2-2(PSD) pursuant to 326 IAC 2-7-10.5(f)(1); (2) the potential to emit of this modification is greater than 25 tons/yr for PM, PM10, and VOC pursuant to 326 IAC 2-7-10.5(f)(4); (3) the potential to emit of this modification is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs pursuant to 326 IAC 2-7-

10.5(f)(6); and (4) this is a modification subject to 326 IAC 8-1-6 pursuant to 326 IAC 2-7-10.5(f)(2).

The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this modification involves changes in a Part 70 permit condition that the source had assumed to avoid 326 IAC 2-2 (PSD) requirements.

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM10	attainment
PM2.5	attainment or unclassifiable
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

(b) Adams County has been classified as unclassifiable or attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions.

(c) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	8
PM10	8
SO_2	0
VOC	233
CO	12
NOx	2

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions are based upon the emission inventory for this source in 2003.

Potential to Emit of Modification After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
PTE of the Modified Spray Booths (2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B)	Less than 18.2	Less than 18.2	--	Less than 320	--	--	165 for a single HAP and 199 for total HAPs
PSD Significant Thresholds	250	250	250	250	250	250	NA

(a) This modification to an existing minor stationary source is major. The modified spray booths (booth 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B) were constructed in 1989 and the VOC emissions from these units were limited to less than 250 tons/yr in OP #01-11-93-0137, issued on December 1, 1989, which rendered the requirements of 326 IAC 2-2 (PSD) not applicable. Since the source requested to increase the total VOC emission limit for these units to greater than 250 tons/yr, these spray booths are now subject to the requirements of 326 IAC 2-2(PSD).

(b) The entire source will become a PSD major source after this modification because the potential to emit VOC of the entire source will be greater than 250 tons/yr.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The coating operations in the modified spray booths apply coatings to the body of motor homes, which are made of a plastic substance. Therefore, the coating operations of this modification are not subject to the requirements of the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM).

(c) The coating operations in the modified spray booths apply coatings to plastic surfaces and the existing source is a HAP major source. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Productions (40 CFR 63.4480 - 63.4581, Subpart PPPP) is applicable.

This modification is not a reconstruction as defined in 40 CFR 63.2. Therefore, this source is considered an existing HAP major source for 40 CFR 63, Subpart PPPP. Pursuant to 40 CFR 63.4483(b), an existing source shall comply with 40 CFR 63, Subpart PPPP by August 29, 2006. The requirements of this NESHAP have been included in the Permittee's Title V renewal permit (T001-17529-00025, issued on February 15, 2005).

(d) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:

(1) With the potential to emit before controls equal to or greater than the major source threshold;

(2) That is subject to an emission limitation or standard; and

(3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

State Rule Applicability - Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B

326 IAC 2-2 (PSD)

Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed in 1989 and will be modified in 2005. Pursuant to CP #01-11-93-0137, issued on December 1, 1989 and T001-17529-00025, issued on February 15, 2005, the VOC usage for all the coating operations at this source is limited to less than 244 tons/yr. Therefore, the construction of these spray booths was not subject to the requirements of 326 IAC 2-2 (PSD).

Since the Permittee requested to increase the VOC input limit for these booths to greater than 250 tons/yr, the requirements of 326 IAC 2-2 (PSD) will be applicable to these booths. Pursuant to 326 IAC 2-2-3 (PSD), the Permittee shall comply with the following requirements for this modification:

(a) The VOC emissions from booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B shall be controlled with the Best Available Control Technology (BACT), pursuant to 326 IAC 2-2-3;

(b) An air quality analysis shall be performed, pursuant to 326 IAC 2-2-4;

(c) An air quality impact analysis shall be performed, pursuant to 326 IAC 2-2-5; and

(d) Additional analysis, such as energy, economy, soil, and vegetation impact analysis shall be performed, pursuant to 326 IAC 2-2-7.

A copy of the BACT analysis can be found in Appendix B and a copy of the additional analysis can be found in Appendix E. Since the VOC increase from this modification is less than 250 tons/yr (320 tons/yr - 105 tons/yr [actual VOC emissions in 2002] = 215 tons/yr), the air quality analysis and the air quality impact analysis are not required for the VOC emissions from this modification. However, this modification is subject to the requirements of 326 IAC 2-2 (PSD) and has potential to emit HAP greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. Therefore, the Permittee is required to perform an air quality analysis for HAPs, pursuant to 326 IAC 2-2-4. A copy of the air quality analysis can be found in Appendix D.

326 IAC 2-4.1 (New Source Toxic Control)

Spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed in 1988 and modified in 2005. The potential to emit HAP from these booths is greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. However, these booths are subject to 40 CFR 63, Subpart PPPP (NESHAP for Surface Coating of Plastic Parts and Productions), which was promulgated on August 29, 2003. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B were constructed after 1980 and each of them has potential VOC emissions greater than 25 tons/yr. In addition, there are no other applicable 326 IAC 8 rules that apply to these plastic coating operations. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are applicable to these spray booths.

The BACT for these booths was determined in OP #01-11-93-0137, issued on December 1, 1989 and revised in SPM #001-12860-00025, issued on October 19, 2001. Pursuant to SPM #001-12860-00025, issued on October 19, 2001, the BACT for these spray booths was determined to be VOC usage limits for each motor home, the use of air atomized spray applications, and good work practice.

The Permittee requested revisions to the existing BACT for these spray booths in order to be consistent with the current BACT determinations for this industry. A revised BACT analysis was submitted by the Permittee on October 28, 2003 and additional information was received on December 18, December 22, 2003, and May 31, 2005. A summary of the BACT analysis is provided in Appendix B. IDEM, OAQ has reviewed the analysis and has determined that the following requirements are the BACT for spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B:

(a) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC content for the coatings applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.5
Adhesive	3.5

(c) The use of HVLP spray applications or its equivalent for spray coating operations.

(d) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(e) Good work practices to minimize leaks, spills and evaporative losses, which include, but are not limited to, the following:

(1) Storing solvent and solvent soaked rags in closed containers.

(2) Sealing lids on all containers not in use or in storage.

(3) The purging of guns and lines into approved containers.

(4) Maintaining an organized spill response and clean-up operation.

(5) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,

(6) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(7) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

326 IAC 6-3-2 (Process Operations)

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 requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, remains an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B 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:

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

Under the rule revision, particulate from these spray booths shall be controlled by dry filters, or equivalent control devices, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This source currently uses dry filters to control overspray. Therefore, spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B are in compliance with 326 IAC 6-3-2.

Compliance Requirements

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

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

The Compliance monitoring requirements applicable to the modification are as follows:

1. Spray booths 2A, 2B, 2C, 2D, 3B, 4A 6A, 6B, 7A, 7B, and 7C have applicable compliance monitoring conditions as specified below:

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

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

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

These monitoring conditions are necessary because these spray booths must operate properly to ensure compliance with 40 CFR 52, Subpart P.

Proposed Changes

The Table of Contents has been changed as necessary. Bold language has been added, language with a line through it has been deleted.

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 manufacturing plant.

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

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

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

…

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth**s** 3A **and 3C**, constructed in 1989 **and 2003 respectively**, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack**s** 3A and **3C, respectively**.

. . .

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] **[326 IAC 1-1-6]**

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) motor home painting operation utilizing air atomization application methods, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, constructed in 1989, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively.

(b) One (1) adhesive application operation utilizing air atomization application methods, identified as spray booth 4A, constructed in 1989, with an average capacity of 200 lbs adhesive per hour, using dry filters as control, and exhausting to stack 4A.

(c) One (1) subassembly painting operation utilizing HVLP spray applicators coating metal, identified as spray/curing booth**s** 3A **and 3C**, constructed in 1989 **and 2003 respectively**, with an average capacity of 3 units per hour, using dry filters as control, and exhausting to stack**s** 3A and **3C, respectively**.

(d) One (1) motor home painting operation utilizing HVLP spray applicators coating non-metal parts, with spray/curing booths identified as 4B, 7C, and 7D, constructed in 2001, using dry filters as control, and exhausting to stacks 4B, 7C, and 7D, respectively.

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

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

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

D.1.~~5~~**4** Volatile Organic Compounds (VOC) BACT Limits **[326 IAC 2-2-3]** [326 IAC 8-1-6]

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

~~(1) The VOC usage per motor home shall be dependent upon the size of the motor home produced as follows:~~

~~(A) Small (30 foot long or less) motor homes shall be limited to a monthly average of 73 pounds of VOC per motor home.~~

~~(B) Large (greater than 30 foot long but less than or equal to 45 foot long) motor homes shall be limited to a monthly average of 111.5 pounds of VOC per motor home.~~

~~(2) Use of air atomization spray application equipment.~~

~~(3) Utilization of low VOC coatings.~~

~~(4) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.~~

(1) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The VOC content for the coatings applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.5
Adhesive	3.5

(3) The use of HVLP spray applications or its equivalent for spray coating operations.

(4) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.

(5) Good work practices to minimize leaks, spills and evaporative losses, which includes, but not limited, to the following:

(A) Storing solvent and solvent soaked rags in closed containers.

(B) Sealing lids on all containers not in use or in storage.

(C) The purging of guns and lines into approved containers.

(D) Maintaining an organized spill response and clean-up operation.

(E) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,

(F) The use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling.

(G) Using aqueous, exempt solvents, or citric cleaners where effective and practical.

. . .

D.1.~~6~~**5** Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.1.~~7~~**6** Particulate Emissions [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the surface coating operations (2A, 2B, 2C, 2D, 3A, 3B, **3C,** 4A, 4B, 6A, 6B, 7A, 7B, 7C and 7D) and the shall not exceed the pound per hour emission rate established as E in the following formula:

…

D.1.~~8~~**7** Particulate [326 IAC 6-3-2(d)]

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

D.1.~~9~~**8** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.1.~~10~~**9** Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.~~11~~**10** Monitoring

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

…

D.1.~~12~~**11** Record Keeping Requirements

(a) To document compliance with Conditions D.1. 4 **and** ~~,~~ D.1.5 ~~and D.1.6~~, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4 **and** ~~,~~ D.1.5 ~~and D.1.6~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The total VOC usage for each month; and

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

(b) To document compliance with Conditions D.1.~~9~~**8** and D.1.~~11~~**10**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

. . .

D.1.~~13~~**12** Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4**(a)(1)**~~, D.1.5~~ and D.1.6**4(b)** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

. . .

D.1.~~14~~**13** Notification Requirements [40 CFR 63.4510]

D.1.~~15~~**14** 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: Fleetwood Motor Homes of Indiana, Inc., # 44
Source Address: 1031 U.S. 224 East, Decatur, Indiana 46733
Mailing Address: P.O. Box 31, Decatur, Indiana 46733
Part 70 Permit No.: T001-17529-00025
Facility: Spray Booths 2A, 2B, 2C, 2D, ~~3A,~~ 3B, 4A, ~~4B,~~ 6A, 6B, 7A, **and** 7B, ~~7C and 7D.~~
Parameter: VOC usage
Limit: Less than ~~244~~ **320** tons per twelve **(12)** month consecutive period, with compliance determined at the end of each month.

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

~~**Part 70 Quarterly Report**~~

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

~~YEAR:_____~~

~~Month~~	~~Column 1~~		~~Column 2~~	~~Column 2/Column 1~~
	~~Number of Motor Homes~~		~~Total Amount of VOC (lbs)~~	~~Amount of VOC per Motor Home (lbs)~~
	~~Small~~	~~Large~~		
~~Month 1~~				
~~Month 2~~				
~~Month 3~~				

~~☐ No deviation occurred in this quarter.~~

~~☐ Deviation/s occurred in this quarter.~~

~~Deviation has been reported on:~~ _____

~~Submitted by:~~ _____
~~Title / Position:~~ _____
~~Signature:~~ _____
~~Date:~~ _____
~~Phone:~~ _____

~~Attach a signed certification to complete this report.~~

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-18132-00025. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 001-18299-00025.

Appendix D

Air Quality Analyses

Source Background and Description

Source Name:	Feetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224E, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operating Permit No.:	T001-17529-00025
Operating Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

Since this modification is subject to the requirements of 326 IAC 2-2 (PSD) and the potential to emit HAP from this modification is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs, the Permittee is required to perform an air quality analysis for HAPs, pursuant to 326 IAC 2-2-4.

Introduction

On October 28, 2003, Fleetwood Motor Homes of Indiana, Inc., #44 (referred to as "Fleetwood") has applied for a PSD Permit to increase the coating usages in the existing booths. The facility is located at Decatur in Adams County, Indiana. This modification will affect ten (10) existing spray booths at the source. The air quality modeling analysis treats the facility as a major modification.

OAQ preformed the modeling for Fleetwood. This document provides an air quality analysis performed by OAQ.

Air Quality Impact Objectives

The air quality impact analysis of the permit application is to accomplish the following objectives and are individually addressed in this document in each section outlined below.

(a) Establish which pollutants require an air quality analysis.

(b) Demonstrate that the source will not cause or contribute to a violation of the National Ambient Air Quality Standard (NAAQS) or Prevention of Significant Deterioration (PSD) increment if the applicant exceeds significant impact levels.

(c) Perform analysis of any air toxic compound for a health risk factor on the general population.

Analysis Summary

All criteria pollutants are below significant emission thresholds so no modeling analysis is required. HAP concentrations were all below .5% of the PEL. There were no HAPs that had representative health risk NATA/CEP benchmarks. Based on modeling results, the source will have no significant impact to air quality.

Criteria Pollutants

Since the modification is only major for VOCs, no other criteria pollutants were examined for modeling. The VOC net increase from the expansion is 215 tons per year (320 tons/yr - 105 tons/yr = 215 tons/yr), which is below the Reactive Plume modeling threshold of 250 tons per year. No RPM modeling is required.

Hazardous Air Pollutant Analysis and Results

As part of the air quality analysis, OAQ requests data concerning the emission of 188 Hazardous Air Pollutants (HAPs) listed in the 1990 Clean Air Act Amendments which are either carcinogenic or otherwise considered toxic. These substances are listed as air toxic compounds on the State of Indiana, Department of Environmental Management, Office of Air Quality construction permit application Form Y. Any HAP emitted from a source will be subject to toxic modeling analysis. The modeled emissions for each HAP are the total emissions, based on assumed operation of 8760 hours per year.

The OAQ review used the Industrial Source Complex Short-Term (ISCST3) model, BEEST Version 9.01 to determine maximum off-property concentrations or impacts for each HAP. All regulatory default options were utilized in the United States Environmental Protection Agency (U.S. EPA) approved model, as listed in the 40 Code of Federal Register Part 51, Appendix W, Guideline on Air Quality Models. The area is considered primarily urban with a portion of the area classified as rural; therefore an urban classification was used. The model also utilized the Schulman-Scire algorithm to account for building downwash effects. The stacks associated with the proposed facility are below the Good Engineering Practice (GEP) formula for stack heights. This indicates wind flow over and around surrounding buildings can influence the dispersion of concentrations from the stack. 326 IAC 1-7-3 requires a study to demonstrate that excessive modeled concentrations will not result from stacks with heights less than the GEP stack height formula. The aerodynamic downwash parameters were calculated using U.S. EPA's Building Profile Input Program (BPIP).

The meteorological data used in the ISCST3 model consisted of the latest 5 years of available surface data from the Indianapolis, Indiana Airport National Weather Service station merged with the mixing heights from Peoria, Illinois Airport National Weather Service station. The 1990 - 1994 meteorological data was purchased through the National Oceanic and Atmospheric Administration (NOAA) and National Climatic Data Center (NCDC) and preprocessed into ISCST3-ready format with U.S. EPA's PCRAMMET.

Ground-level points (receptors) surrounding the source are input into the model to determine the maximum modeled concentrations that would occur at each point. OAQ modeling utilized a Cartesian receptor grid out to 1 kilometer for all HAPs with receptors placed at distances of 100-meter intervals, which includes fenceline receptors. The total number of receptors was 699.

Maximum 8-hour concentrations were determined and the concentrations were recorded. The PELs were established by the Occupational Safety and Health Administration (OSHA) and represent a worker's exposure to a pollutant over an 8-hour workday or a 40-hour workweek. In the table below, the results of the HAP analysis with the emission rates, modeled concentrations, and the 0.5% of the PEL for each HAP is listed. All HAP concentrations were modeled below 0.5% of their respective PEL. The 0.5% of the PEL represents a safety factor of 200 taken into account when determining the health risk of the general population.

Hazardous Air Pollutant Analysis			
Hazardous Air Pollutans	HAP Emissions (tons/yr)	Maximum 8-hour Concentrations ($\mu g/m^3$)	.5% of PEL ($\mu g/m^3$)
Hexane	2.94	13.4	9,000
Glycol Ethers	5.74	11.8	N/A
Xylene	160	328	435,000
Toluene	1.42	6.5	750,000
Ethylbenzene	28.7	57.9	435,000

A health risk-based analysis was not performed because none of the above HAPs had a NATA/CEP cancer risk benchmark associated with it.

Appendix E

Additional Environmental Impact Analyses

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, Inc., #44
Source Location:	1031 U.S. 224E, Decatur, Indiana 46733
County:	Adams
SIC Code:	3716
Operating Permit No.:	T001-17529-00025
Operating Permit Issuance Date:	February 15, 2005
Significant Source Modification No.:	001-18132-00025
Significant Permit Modification No.:	001-18299-00025
Permit Reviewer:	ERG/YC

Since this modification is subject to the requirements of 326 IAC 2-2 (PSD), the Permittee is required to perform additional analysis, such as energy, economy, soil, and vegetation impact analysis for this modification, pursuant to 326 IAC 2-2-7. A copy of this analysis was submitted by the source on January 14, 2004 and is summarized below:

Economic Growth and Impact of Construction Analysis:

No construction is planned at Fleetwood Motor Homes of Indiana, Inc., #44 as a result of this modification. Industrial and residential growth as a result of this modification will be minimal. There will be no adverse impact in the local area due to industrial, residential or commercial growth to support this modification.

Soil Impact Analysis:

The primary NAAQS are intended to protect the public health. The secondary NAAQS are intended to protect the public welfare from adverse effects of airborne effluents. This protection extends to agricultural soil. Since the increased VOC emissions from this modification are below the thresholds for which modeling is required, the VOC emissions are below the threshold limit that would be necessary to adversely impact the surrounding soil. No significant adverse impact on soil is anticipated.

Vegetation Impact Analysis:

The effects of gaseous air pollutants on vegetation may be classified into three rather broad categories: acute, chronic, and long-term. Acute effects are those that result from relatively short (less than one month) exposures to high concentrations of pollutants. Chronic effects occur when organisms are exposed for months or even years to certain threshold levels of pollutants. Long-term effects include abnormal changes in ecosystems and subtle physiological alterations in organisms. Acute and chronic effects are caused by the gaseous pollutant acting directly on the organism; whereas, long-term effects may be indirectly caused by secondary agents such as changes in soil pH. Emissions may affect vegetation either by direct contact with leaf surfaces or by solution in water drops, becoming acidic. Since the increased emissions from this modification are below the thresholds for which modeling is required, the VOC emissions are below the threshold limits that would be necessary to adversely impact the surrounding vegetation. No significant adverse impact on vegetation is anticipated.

Federal and State Endangered Species Analysis:

The U.S. Fish and Wildlife Service, Division of Endangered Species for Indiana list twelve species of mussels, four species of birds, two species of bat and butterflies and one species of snake as federally endangered or threatened species. The Indiana Department of Environmental Management lists one species of birds and one species of mammals as endangered. Agriculture has disturbed the habitats of butterflies and snakes and the proposed modification will not further impact these habitats; furthermore, the mussels and birds are typically found along bodies of water whereas the bats are found in caves. Therefore, no significant adverse impact on these species is anticipated.

The U.S. Fish and Wildlife Service, Division of Endangered Species for Indiana list two threatened plant species and one endangered plant species. The endangered plant is found near the sand dunes in northern Indiana, and not in Adams County. The threatened species do not thrive on cultivated or grazing land. Therefore, no significant adverse impact on these species is anticipated.

Conclusions:

The results of this analysis conclude that the proposed modification at this source will have no significant adverse impact on economic growth, soils, vegetation, and endangered or threatened species.