



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 28, 2004

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

TO: Interested Parties / Applicant

RE: Newmar Corporation / 039-18599-00157

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

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 9/16/03



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

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June 28, 2004

Mr. Richard E. Parks  
Newmar Corporation  
P.O. Box 30  
Nappanee, IN 46550-0030

Re: 039-18599  
Significant Source Modification to:  
Part 70 Operating Permit No.: T 039-7571-00157

Dear Mr. Parks:

Newmar Corporation was issued Part 70 Operating Permit T 039-7571-00157 on October 18, 1999 for a stationary motor home and travel trailer manufacturing source. An application to modify the source was received on January 9, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (c) One (1) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to four (4) stacks, identified as SV-3.1a, SV-3.1b, SV-3.2a, and SV-3.2b, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
  - (3) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.
  - (4) One (1) paint storage room, identified as EU-03.4, constructed in 2004, exhausting to stack SV-3.4.
- (i) One (1) welding area, consisting of 56 MIG welding stations (carbon steel), capacity: 1.05 pounds per hour of wire per station and 15 MIG welding stations (aluminum), capacity: 0.185 pounds per hour of wire per station, identified as EU-09, constructed in 2004.
- (j) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to four (4) stacks, identified as SV-8.1a, SV-8.1b, SV-8.2a, and SV-8.2b, constructed in 2004, capacity: 3.00 units per hour.
- (k) Three (3) natural gas fired furnaces, rated at 0.60 million British thermal units per hour, each.

- (l) Four (4) natural gas fired air make-up units, rated at 2.70 million British thermal units per hour, each.

and the change of capacity in:

- (a) EU-01 (Hardwoods)

One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLP spray guns, for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour being reduced to 3.56 recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)

One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Craig J. Friederich c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments (Changed permit pages, TSD)

CJF/MES

cc: File - Elkhart County  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner



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## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Newmar Corporation  
355 North Delaware Street  
Nappanee, Indiana 46550-0030**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.

Fifth Significant Source Modification 039-18599-00157	Sections Affected: A.2, D.1, D.3, D.10, and the Quarterly Report Forms
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 28, 2004

**D.1 FACILITY OPERATION CONDITIONS**  
**One Spray Paint Booth (B-1) and One Dip Tank (EU-01)**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12] [326 IAC 2-2]
- D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]
- D.1.3 Volatile Hazardous Air Pollutant (VHAP) [326 IAC 14][40 CFR Part 63.802]  
[40 CFR Subpart JJ]
- D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.5 Work Practice Standards [326 IAC 14] [40 CFR Part 63.803]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.7 Performance Test Methods [326 IAC 14] [40 CFR Part 63.805]
- D.1.8 VOC Emissions

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

- D.1.9 Particulate Matter (PM)
- D.1.10 Training Requirements
- D.1.11 Compliance Procedures and Monitoring Requirements [326 IAC 14] [40 CFR Part 63.804]

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

- D.1.12 Record Keeping Requirements [326 IAC 14] [40 CFR Part 63.806]
- D.1.13 Reporting Requirements [326 IAC 14] [40 CFR Part 63.807]

**D.3 FACILITY OPERATION CONDITIONS**  
**One (1) frame painting operation (EU-03)**

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

- D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A]  
[Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]
- D.3.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating  
of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]
- D.3.3 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]
- D.3.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.3.6 Volatile Organic Compounds
- D.3.7 VOC Emissions

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

- D.3.8 Particulate Matter (PM)
- D.3.9 Training Requirements

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

- D.3.10 Record Keeping Requirements
- D.3.11 Reporting Requirements
- D.3.12 Notification Requirements [40 CFR 63.3910]
- D.3.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12]  
[326 IAC 2-7-5]

**D.9 FACILITY OPERATION CONDITIONS  
Unit Heaters and Welding Operations**

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

- D.9.1 Particulate Matter (PM) [326 IAC 6-3]
- D.9.2 Particulate Matter (PM) [326 IAC 6-3]

**Compliance Determination Requirements**

- D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.10 FACILITY OPERATION CONDITIONS  
One (1) frame undercoating operation (EU-08)**

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

- D.10.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]
- D.10.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]
- D.10.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

**Compliance Determination Requirements**

- D.10.5 Volatile Organic Compounds (VOC)
- D.10.6 Particulate Matter (PM)

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

- D.10.7 Record Keeping Requirements
- D.10.8 Reporting Requirements
- D.10.9 Notification Requirements [40 CFR 63.3910]
- D.10.10 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

**Certification**  
**Emergency/Deviation Occurrence Report**  
**Quarterly Reports (Entire Source)**  
**Semi-Annual Report**  
**Quarterly Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary motor home and travel trailer manufacturing facility.

Responsible Official: Richard E. Parks  
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030  
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030  
SIC Code: 3716 and 3792  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source under PSD  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) EU-01 (Hardwoods)
  - One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLV) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLV spray guns, for coating of interior wood components with a maximum capacity of 3.56 recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)
  - One (1) Dip Tank, with a capacity of 3.56 units per hour, exhausting to general ventilation. (1982)
- (b) EU-02 (Custom Coating)
  - Two (2) high volume low pressure (HVLV) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)
- (c) One (1) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLV) spray applicators and dry filters for particulate control, exhausting to four (4) stacks, identified as SV-3.1a, SV-3.1b, SV-3.2a, and SV-3.2b, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.

- (3) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.
- (4) One (1) paint storage room, identified as EU-03.4, constructed in 2004, exhausting to stack SV-3.4.
- (d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)
- (e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) high volume low pressure (HVLP) spray and hand lay up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack SV-5. (1995)
- (f) EU-06 (R&D, Service & Warranty) Full body coating
  - One (1) spray paint booth (R & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
  - Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and each exhausting at two (2) stacks, identified as SV6-1A and SV6-1B and SV6-2A and SV6-2B, respectively, capacity: 1.0 motor home or travel trailer per hour, each. (1998)
  - One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.
  - One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.
  - One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.
- (g) EU-07 (Woodworking)
  - One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally, located at North Delaware Street. (1981)
  - One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at Research and Development Center. (1996)
  - One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity, located at Service and Repair Center. (1998)
- (h) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;
- (i) One (1) welding area, consisting of 56 MIG welding stations (carbon steel), capacity: 1.05 pounds per hour of wire per station and 15 MIG welding stations (aluminum), capacity: 0.185 pounds per hour of wire per station, identified as EU-09, constructed in 2004.

- (j) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to four (4) stacks, identified as SV-8.1a, SV-8.1b, SV-8.2a, and SV-8.2b, constructed in 2004, capacity: 3.00 units per hour.
- (k) Three (3) natural gas fired furnaces, rated at 0.60 million British thermal units per hour, each.
- (l) Four (4) natural gas fired air make-up units, rated at 2.70 million British thermal units per hour, each.

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

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

- (a) Welding operations
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including three (3) makeup air units with a total heat input capacity of 9.192 million British thermal units per hour.

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

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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 D.1

## FACILITY OPERATION CONDITIONS

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

EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLV) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLV spray guns, for coating of interior wood components with a maximum capacity of 3.56 recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)

One (1) Dip Tank B-1 with a capacity of 3.56 units per hour, exhausting to general ventilation. (1982)

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

#### D.1.1 Volatile Organic Compounds (Wood Furniture and Cabinet Coating) [326 IAC 8-2-12] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood components in paint areas identified as B-1 and B-2, shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLV	Aerosol Spray Cans

- (b) High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLV) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (c) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3 (existing frames) the, FRP Booth, the existing undercoating spray booth, identified as EU-08, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to EU-01 (Hardwoods) shall not exceed 67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating

operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).

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

#### **D.1.12 Record Keeping Requirements [326 IAC 14][40 CFR Part 63.806]**

- (a) To document compliance with Conditions D.1.1(c), D.1.1(d) and D.1.1(e) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(c). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the months of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with condition D.1.9 and D.1.10, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) The owner or operator of the spray paint areas B-1 and B-2 shall fulfill all record keeping requirements of § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.
- (d) The owner or operator of the spray paint areas B-1 and B-2 subject to the emission limits in Condition D.1.3 of this permit shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in § 63.802; and
  - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802; and
  - (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in § 63.802 (b)(3).
- (e) The owner or operator of the spray paint areas B-1 and B-2 shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

- (1) Records demonstrating that the operator training program required by § 63.803(b) is in place;
  - (2) Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);
  - (3) Records associated with the cleaning solvent accounting system required by § 63.803(d);
  - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by § 63.803(h)(5).
  - (5) Records associated with the formulation assessment plan required by § 63.803(l);  
and
  - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) The owner or operator of the spray paint areas B-1 and B-2 subject to the emission limits in D.1.3 and following the compliance provisions of § 63.804(f) (3), and § 63.804(g)(3)(I), shall maintain records of the compliance certifications submitted in accordance with § 63.807(c) for each semiannual period following the compliance date.
  - (g) The owner or operator of the spray paint areas B-1 and B-2 shall maintain records of all other information submitted with the compliance status report required by § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).
  - (h) The owner or operator of the spray paint areas B-1 and B-2 shall maintain all records in accordance with the requirements of § 63.10(b)(1).
  - (i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements [326 IAC 14] [40 CFR Part 63.807]

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1(c), D.1.1(d) and D.1.1(e), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) The owner or operator of the spray paint areas B-1 and B-2 subject to this subpart shall fulfill all reporting requirements of § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.
- (c) The owner or operator of the spray paint areas B-1 and B-2 demonstrating compliance in accordance with § 63.804(f) (3) shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by § 63.804(f) (3) of this subpart and submitted to the address listed in Section C - General Reporting Requirements, of this permit.

- (d) The owner or operator of the spray paint areas B-1 and B-2 demonstrating compliance in accordance with § 63.804(g) (3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
- (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
  - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
  - (3) The semiannual reports shall include the information required by § 63.804(g) (3), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
  - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

The report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) frame painting operation, identified as EU-03, consisting of:
- (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to four (4) stacks, identified as SV-3.1a, SV-3.1b, SV-3.2a and SV-3.2b, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
  - (3) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.
  - (4) One (1) paint storage room, identified as EU-03.4, constructed in 2004, exhausting to stack SV-3.4.

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

#### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (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 M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

#### D.3.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal 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/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (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 63.3980, and are applicable to the affected source.

D.3.3 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, the volatile organic compound (VOC) content of coatings applied to metal frames in the paint booth identified as B-3 shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Extreme Performance Coat	3.5

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the Spray Paint Booth B-3 (existing frames) and the usage of cleanup solvent for the Spray Paint Booth B-3 (existing frames) (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2 the, FRP Booth, the existing undercoating spray booth, identified as EU-08, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, and the usage of cleanup solvent for the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, and the one (1) dip tank, identified as EU-03.3 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to the one (1) frame painting operation (EU-03) shall not exceed 32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.
- (g) In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-

03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).

- (h) Any change or modification which would increase the potential to emit VOC from coating metal in the water based frame paint booth to fifteen (15) pounds per day or more in this emission unit, shall obtain prior approval from IDEM, OAQ and shall be subject to requirements of 326 IAC 8-2-9.

#### D.3.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the two (2) spray paint booths, identified as EU-03.1 and EU-03.2 shall have PM allowable emissions using the following equation:

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

where E = PM allowable emissions in pounds per hour  
P = Process weight rate in tons per hour

### Compliance Determination Requirements

#### D.3.6 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 8-1-2 (a) (7) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.3.7 VOC Emissions

Compliance with Conditions D.3.3(c), D.3.3(d) and D.3.3(e) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

#### D.3.10 Record Keeping Requirements

(a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the months of use;
- (3) The cleanup solvent usage for each month;
- (4) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$A = 3 ( C * U ) / 3 U \quad \# \quad 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon

C = VOC content of coating in pounds VOC per gallon

U = usage rate of coating in gallons per day

- (5) The total VOC usage for each month;
  - (6) The total HAP usage for each month;
  - (7) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.3.8 and D.3.9, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.3(c), D.3.3(d) and D.3.3(e) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

#### D.3.12 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification 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 Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

#### D.3.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

Newmar Corporation  
Nappanee, Indiana  
Permit Reviewer: KERAMIDA/RMEH

Fifth Significant Source Modification 039-18599  
Modified by: CJF/MES

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OP No. T039-7571-00157

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

## SECTION D.9 FACILITY OPERATION CONDITIONS

- (a) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;
- (b) One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;

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

#### D.9.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the paint booth emission unit shall not exceed the allowable PM emission from the following equation:

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

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

#### D.9.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the welding emission units shall be limited to 2.47 pounds per hour. This limit was determined by the following:

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

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

### Compliance Determination Requirements

#### D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.9.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.10

## FACILITY OPERATION CONDITIONS

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

- (l) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to four (4) stacks, identified as SV-8.1a, SV-8.1b, SV-8.2a, and SV-8.2b, constructed in 2004, capacity: 3.00 units per hour.

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

#### D.10.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (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 M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

#### D.10.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal 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/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (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 63.3980, and are applicable to the affected source.

D.10.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the frame undercoating operation, identified as EU-08, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in the frame undercoating operation, identified as EU-08, shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried or forced warm air dried coatings.
- (b) Solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the existing undercoating spray booth, identified as EU-08, in combination with input VOC from Spray Booths B-1, B-2, B-3, FRP Booth, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the frame undercoating operation, identified as EU-08, and the usage of cleanup solvent for the frame undercoating operation, identified as EU-08 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, Spray Booth B-1, Spray Booth B-2, the FRP Booth, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to the frame undercoating operation, identified as EU-08, shall not exceed 12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.
- (g) In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).

## Compliance Determination Requirements

### D.10.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.10.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

## Compliance Monitoring Requirements

### D.10.6 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

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

### D.10.7 Record Keeping Requirements

- (a) To document compliance with Condition D.10.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the month of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.10.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.4, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### D.10.9 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification 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 Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.10.10 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

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

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

**Part 70 Quarterly Report**

Source Name: Newmar Corporation  
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030  
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030  
Part 70 Permit No.: T 039-7571-00157  
Facility: Entire Source  
Parameter: VOC usage (tons)  
Limit: 138.28 tons per twelve (12) consecutive month period from BR-1, BR-2, BR-3, BR-4 and BR-5;  
70 tons per twelve (12) consecutive month period from B-2a and B-2b; and  
Phase 1: < 165.91 tons per twelve (12) consecutive month period from Spray Booths B-1, B-2, B-3 (existing frames), FRP Booth, the existing undercoating spray booth, and insignificant activities;  
Phase 2: < 194.53 tons per twelve (12) consecutive month period from Spray Booths B-1 and B-2, in combination with Spray Booths EU-03.1, EU-03.2, dip tank EU-03.3, FRP booth, frame undercoating operation (EU-08) and insignificant activities  
67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month from EU-01 (Hardwoods);  
32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month from frame painting operation (EU-03); and  
12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month from frame undercoating operation (EU-08).

**Part 70 Quarterly Report** (continued)

Month: \_\_\_\_\_

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 through BR-5	138.28			
Paint Booths B-2a and B-2b	70			
Phase 1: Spray Booths B-1, B- 2, and B-3(existing frames), FRP booth, the existing undercoating spray booth, and other emissions from insignificant activities	<165.91			
Phase 2: Spray Booths B-1, B-2, Spray Paint Booths EU- 03.1 and EU-03.2, Dip Tank EU-03.3, FRP Booth, the Frame Undercoating Operation (EU-08), and insignificant activities	<194.53			
EU-01 (Hardwoods)	67.5			
Frame Painting Operation (EU-03)	32.47			
Frame Undercoating Operation (EU-08)	12.68			

☐ 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.

Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Newmar Corporation  
P.O. Box 30  
Nappanee, Indiana 46550-0030

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

- 1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- 2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
- 3. By virtue of my position with \_\_\_\_\_, I have personal knowledge of the  
(Company Name)  
representations contained in this affidavit and am authorized to make these representations on behalf of  
\_\_\_\_\_.  
(Company Name)
- 4. I hereby certify that Newmar Corporation, 355 North Delaware Street, Nappanee, IN 46550-0030, completed construction of the frame paint operation (EU-03), the frame undercoating operation (EU-08), the welding operations (EU-09) and the combustion operations on \_\_\_\_\_ in conformity with the requirements and intent of the Part 70 Operating Permit modification application received by the Office of Air Quality on January 9, 2004 and as permitted pursuant to **Significant Source Modification No. 039-18599, Plant ID No. 039-00157** issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Quality

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

<b>Source Name:</b>	<b>Newmar Corporation</b>
<b>Source Location:</b>	<b>355 North Delaware Street, Nappanee, IN 46550-0030</b>
<b>County:</b>	<b>Elkhart</b>
<b>Operation Permit No.:</b>	<b>T 039-7571-00157</b>
<b>Significant Source Modification No.:</b>	<b>039-18599-00157</b>
<b>Significant Permit Modification No.:</b>	<b>039-18697-00157</b>
<b>SIC Code:</b>	<b>3716, 3792</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

On May 14, 2004, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Newmar Corporation had applied for a Significant Permit Modification to a Part 70 Operating Permit to construct a frame painting operation, a frame undercoating operation, and welding operation. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On May 20, 2004, Robert D. Waugaman of Bruce Carter Associates, LLC, submitted comments on the proposed Significant Permit Modification to a Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### **Comment 1:**

The diesel engine test cell listed in A.2 (i) and elsewhere in the permit should be removed as it was never installed.

#### **Response 1:**

The diesel engine test cell has been removed as follows:

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

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

(i) ~~One (1) diesel engine Test Cell with a capacity of 260 horsepower;~~

## SECTION D.9 FACILITY OPERATION CONDITIONS

- (a) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;
- ~~(b) One (1) diesel engine Test Cell with a capacity of 260 horsepower;~~
- (eb) One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;
- (ec) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.

### Comment 2:

The following conditions, D.1.1(e), D.3.3(e) and D.3.7, should be changed to allow for time to do the necessary record retrieval and calculations to determine compliance with the applicable condition. The phrase "at the end of each month" should be replaced with the phrase "within 30 days of the end of each month" in each of these conditions.

### Response 2:

Compliance with these emission limits shall be demonstrated at the end of each month in order to make the requirements of 326 IAC 2-2 not applicable. The calculation of the monthly VOC emissions is based upon a calendar month as opposed to the "15<sup>th</sup> of the next month". The actual records must be available after the last day of the month, and the quarterly report to show compliance with these conditions must be submitted within thirty (30) days after the end of the quarter. Therefore, the additional suggested wording is not necessary for defining when the calculation must be performed. Language has been added to Conditions D.1.12, D.3.10, and D.10.7 to indicate that the records necessary to demonstrate compliance with these limits shall be available within thirty (30) days after the end of each compliance period.

#### D.1.12 Record Keeping Requirements [326 IAC 14][40 CFR Part 63.806]

- (a) To document compliance with Conditions D.1.1(c), D.1.1(d) and D.1.1(e) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(c). **Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.**

#### D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3. **Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.**

#### D.10.7 Record Keeping Requirements

- (a) To document compliance with Condition D.10.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.4. **Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.**

**Comment 3:**

Conditions D.1.1(c), D.3.3(c), and D.10.4(c) should have the phrase “identified as EU-08” inserted after the phrase “the existing undercoating spray booth”.

**Response 3:**

The additional descriptive language has been added as follows:

D.1.1 Volatile Organic Compounds (Wood Furniture and Cabinet Coating) [326 IAC 8-2-12] [326 IAC 2-2]

(c) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3 (existing frames) the, FRP Booth, the existing undercoating spray booth, **identified as EU-08**, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

(c) The input VOC to the Spray Paint Booth B-3 (existing frames) and the usage of cleanup solvent for the Spray Paint Booth B-3 (existing frames) (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2 the, FRP Booth, the existing undercoating spray booth, **identified as EU-08**, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 2-2]

(c) The input VOC to the existing undercoating spray booth, **identified as EU-08** in combination with input VOC from Spray Booths B-1, B-2, B-3, FRP Booth, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**Comment 4:**

An Affidavit of Construction was included in with the draft permit. It is our understanding that this document is not needed for modifications to existing Part 70 Operating Permits. If this is correct, this document should be removed from the permit.

**Response 4:**

The conditions of the Source Modification do not require an Affidavit of Construction. Therefore, the Affidavit of Construction will be removed from the active permit file.

**Comment 5:**

This modification involves the construction of new frame paint and undercoating booths and the removal of the related existing booths. Ideally, Newmar would shut down production at the existing booths on Friday and then Monday morning start production in the new booths. Due to the complexity of moving the two production lines involved, motorized units and towable units, both lines

will probably not be moved at the same time. This would require that for a short period of time, some units would be processed in the new booths while other units would need to still be processed in the existing booths. The inclusion of a 30 to 60 day transition period in the appropriate permit conditions would help solve this problem. A related issue involves the change and tracking of the permit limits during this period. Initially, the VOC limit for the affected areas will be increased to 165.91 TPY due to the increase in the wood coating area. Once all changes are made and production has been moved to the new area, this VOC limit will be increased to 194.53 TPY. This problem occurs during the transition period and the way the current language is written. The language is all right for the beginning period and the final limit but not during the transition. Newmar requests that language be added where needed to allow for a 60 day transition period.

#### Response 5:

Conditions D.1.1, D.3.3. and D.10.4 have been revised to account for the transition period between the time that the new facilities begin operation and the time the new facilities are fully operational. Pursuant to 326 IAC 2-2-1(cc)(2)(F) the new facilities will become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days. Therefore, Conditions D.1.1, D.3.3. and D.10.4 have been revised as follows:

#### D.1.1 Volatile Organic Compounds (Wood Furniture and Cabinet Coating) [326 IAC 8-2-12] [326 IAC 2-2]

- (c) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3 (existing frames) the, FRP Booth, the existing undercoating spray booth, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to EU-01 (Hardwoods) shall not exceed 67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) **In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).**

#### D.3.3 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, the volatile organic compound (VOC) content of coatings applied to metal frames in the paint booth identified as B-3 shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Extreme Performance Coat	3.5

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the Spray Paint Booth B-3 (existing frames) and the usage of cleanup solvent for the Spray Paint Booth B-3 (existing frames) (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2 the, FRP Booth, the existing undercoating spray booth, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, and the usage of cleanup solvent for the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, and the one (1) dip tank, identified as EU-03.3 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to the one (1) frame painting operation (EU-03) shall not exceed 32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.
- (g) In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).**

D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in the frame undercoating operation, identified as EU-08, shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried or forced warm air dried coatings.
- (b) Solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the existing undercoating spray booth in combination with input VOC from Spray Booths B-1, B-2, B-3, FRP Booth, and insignificant activities, shall be limited to less than 165.91 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the frame undercoating operation, identified as EU-08, and the usage of cleanup solvent for the frame undercoating operation, identified as EU-08 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, Spray Booth B-1, Spray Booth B-2, the FRP Booth, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to the frame undercoating operation, identified as EU-08, shall not exceed 12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.
- (g) In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall shut down the existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) when the new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational. The new frame painting operation (EU-03) and the new frame undercoating operation (EU-08) become operational only after a reasonable shakedown period which shall not exceed one hundred eighty (180) days pursuant to 326 IAC 2-2-1(cc)(2)(F).**

**Comment 6:**

The water based frame paint booth listed at A.2(k) will be one of the booths replaced during this modification.

**Response 6:**

The description of the new frame painting operation has been revised to reflect the fact that the existing water based frame paint booth will also be part of the reconstructed frame painting operation. Condition D.9.3 has been deleted and replaced by Condition D.3.3(h). The changes are as follows, with all subsequent equipment being re-lettered accordingly:

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) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-3.1a, SV-3.1b, SV-3.1c, SV-3.1d, SV-3.2a, SV-3.2b, SV-3.2c, and SV-3.2d, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
  - (3) **One (1) water based frame paint booth with rate of production as 0.1 unit per hour.**
- ~~(j) One (1) water based frame paint booth with rate of production as 0.1 unit per hour; and~~

**SECTION D.9 FACILITY OPERATION CONDITIONS**

- (a) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;
- (eb) One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;
- ~~(dc) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.~~

~~D.9.3 Miscellaneous metal Coating Operations (326 IAC 8-2-9)~~

~~Any change or modification which would increase the potential to emit VOC from coating metal to fifteen (15) pounds per day or more in this emission unit, shall obtain prior approval from IDEM, OAM and shall be subject to requirements of 326 IAC 8-2-9.~~

D.3.3 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

- (h) **Any change or modification which would increase the potential to emit VOC from coating metal in the water based frame paint booth to fifteen (15) pounds per day or more in this emission unit, shall obtain prior approval from IDEM, OAQ and shall be subject to requirements of 326 IAC 8-2-9.**

**Comment 7:**

Due to some minor changes in booth specifications, the number of exhaust fans and related stacks will be reduced from four (4) per booth to two (2) per booth. Also, a paint storage room with an exhaust stack identified as SV-3.4 will be added for the frame painting line. A revised GSD-04, Stack/Vent Form is enclosed with the necessary stack information. Emissions will not change as a result, only the number of emission points.

**Response 7:**

As a result of these stack changes, the following stack/vent table has been revised.

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV-3.1a	Frame Painting	36.0	2.83	<del>12,250</del> <b>12,375</b>	Ambient
SV-3.1b	Frame Painting	36.0	2.83	<del>12,250</del> <b>12,375</b>	Ambient
<del>SV-3.1c</del>	<del>Frame Painting</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
<del>SV-3.1d</del>	<del>Frame Painting</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
SV-3.2a	Frame Painting	36.0	2.83	<del>12,250</del> <b>12,375</b>	Ambient
SV-3.2b	Frame Painting	36.0	2.83	<del>12,250</del> <b>12,375</b>	Ambient
<del>SV-3.2c</del>	<del>Frame Painting</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
<del>SV-3.2d</del>	<del>Frame Painting</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
SV-8.1a	Undercoating	36.0	2.83	<del>12,250</del> <b>9,000</b>	Ambient
SV-8.1b	Undercoating	36.0	2.83	<del>12,250</del> <b>9,000</b>	Ambient
<del>SV-8.1c</del>	<del>Undercoating</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
<del>SV-8.1d</del>	<del>Undercoating</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
SV-8.2a	Undercoating	36.0	2.83	<del>12,250</del> <b>9,000</b>	Ambient
SV-8.2b	Undercoating	36.0	2.83	<del>12,250</del> <b>9,000</b>	Ambient
<del>SV-8.2c</del>	<del>Undercoating</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
<del>SV-8.2d</del>	<del>Undercoating</del>	<del>36.0</del>	<del>2.83</del>	<del>12,250</del>	<del>Ambient</del>
<b>SV-3.4</b>	<b>Paint Storage Room</b>	<b>36.0</b>	<b>1.00</b>	<b>1,000</b>	<b>Ambient</b>

The following changes have been made to Condition A.2 and Sections D.3, and D.10.

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) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to ~~eight (8)~~ **four (4)** stacks, identified as SV-3.1a, SV-3.1b, ~~SV-3.1c, SV-3.1d, SV-3.2a, and SV-3.2b, SV-3.2c, and SV-3.2d~~, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
  - (3) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.

- (4) **One (1) paint storage room, identified as EU-03.4, constructed in 2004, exhausting to stack SV-3.4.**
  
- (h) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to ~~eight (8)~~ **four (4)** stacks, identified as SV-8.1a, SV-8.1b, ~~SV-8.1c, SV-8.1d,~~ SV-8.2a, **and** SV-8.2b, ~~SV-8.2c, and SV-8.2d,~~ constructed in 2004, capacity: 3.00 units per hour.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

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

- (c) One (1) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLV) spray applicators and dry filters for particulate control, exhausting to ~~eight (8)~~ **four (4)** stacks, identified as SV-3.1a, SV-3.1b, ~~SV-3.1c, SV-3.1d,~~ SV-3.2a, **and** SV-3.2b, ~~SV-3.2c, and SV-3.2d,~~ constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
  - (3) One (1) water based frame paint booth with rate of production as 0.1 unit per hour.
  - (4) **One (1) paint storage room, identified as EU-03.4, constructed in 2004, exhausting to stack SV-3.4.**

**SECTION D.10 FACILITY OPERATION CONDITIONS**

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

- (l) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to ~~eight (8)~~ **four (4)** stacks, identified as SV-8.1a, SV-8.1b, ~~SV-8.1c, SV-8.1d,~~ SV-8.2a, **and** SV-8.2b, constructed in 2004, capacity: 3.00 units per hour.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

<b>Source Name:</b>	<b>Newmar Corporation</b>
<b>Source Location:</b>	<b>355 North Delaware Street, Nappanee, Indiana 46550-0030</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3716 and 3792</b>
<b>Operation Permit No.:</b>	<b>T 039-7571-00157</b>
<b>Operation Permit Issuance Date:</b>	<b>October 18, 1999</b>
<b>Significant Source Modification No.:</b>	<b>039-18599-00157</b>
<b>Significant Permit Modification No.:</b>	<b>039-18697-00157</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Newmar Corporation relating to the construction of the following emission units and pollution control devices:

- (c) One (1) frame painting operation, identified as EU-03, consisting of:
  - (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-3.1a, SV-3.1b, SV-3.1c, SV-3.1d, SV-3.2a, SV-3.2b, SV-3.2c, and SV-3.2d, constructed in 2004, capacity: 3.56 units per hour, total.
  - (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.
- (j) One (1) welding area, consisting of 56 MIG welding stations (carbon steel), capacity: 1.05 pounds per hour of wire per station and 15 MIG welding stations (aluminum), capacity: 0.185 pounds per hour of wire per station, identified as EU-09, constructed in 2004.
- (l) One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-8.1a, SV-8.1b, SV-8.1c, SV-8.1d, SV-8.2a, SV-8.2b, SV-8.2c, and SV-8.2d, constructed in 2004, capacity: 3.00 units per hour.
- (m) Three (3) natural gas fired furnaces, rated at 0.60 million British thermal units per hour, each.
- (n) Four (4) natural gas fired air make-up units, rated at 2.70 million British thermal units per hour, each.

and the change of capacity in:

(a) EU-01 (Hardwoods)

One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLP spray guns, for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour being reduced to 3.56 recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)

One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

**History**

On January 9, 2004, Newmar Corporation submitted an application to the OAQ requesting to remove EU-03 (frames), one (1) metal inert gas welding process, and one (1) undercoating booth, identified as EU-08. The source is constructing an additional building on site and will be removing these portions of emission units. Upon completion of the additional building, Newmar will be constructing a new frame painting operation, to be designated as EU-03, a new welding area, to be designated as EU-09, and a new frame undercoating operation, to be designated as EU-08. The source is also increasing production at the Hardwoods spray and dip tank operations identified as EU-01. Newmar had been actually operating the hardwoods emission unit at 1.96 units per hour, and will increase it to 3.56 units per hour. The Part 70 Operating Permit indicated that the maximum capacity of the hardwoods emissions unit was 4.00 recreational vehicles, or units, per hour. The source has corrected this and indicated that the maximum capacity will be limited to no more than 3.56 units per hour. Thus, the equipment list will be revised.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV-3.1a	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.1b	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.1c	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.1d	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.2a	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.2b	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.2c	Frame Painting	36.0	2.83	12,250	Ambient
SV-3.2d	Frame Painting	36.0	2.83	12,250	Ambient
SV-8.1a	Undercoating	36.0	2.83	12,250	Ambient
SV-8.1b	Undercoating	36.0	2.83	12,250	Ambient
SV-8.1c	Undercoating	36.0	2.83	12,250	Ambient

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV-8.1d	Undercoating	36.0	2.83	12,250	Ambient
SV-8.2a	Undercoating	36.0	2.83	12,250	Ambient
SV-8.2b	Undercoating	36.0	2.83	12,250	Ambient
SV-8.2c	Undercoating	36.0	2.83	12,250	Ambient
SV-8.2d	Undercoating	36.0	2.83	12,250	Ambient

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Significant Source 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 January 9, 2004. Additional information was received on March 18, March 29, and April 1, 2004.

**Emission Calculations**

See pages 1 through 5 of 5 of Appendix A of this document for detailed emissions calculations.

**Potential To Emit of Modification**

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

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

Pollutant	Potential To Emit (tons/year)
PM	130
PM <sub>10</sub>	130
SO <sub>2</sub>	0.033
VOC	259
CO	4.64
NO <sub>x</sub>	5.52

HAPs	Potential To Emit (tons/year)
Single HAP	Less Than 10
Total HAPs	Less Than 25

**Justification for Modification**

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4), because the potential to emit PM<sub>10</sub> and VOC is each greater than twenty-five (25) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-18697-00157) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission unit.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is not 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 and Emission Offset applicability.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	Greater Than 100, Less Than 250
PM <sub>10</sub>	Greater Than 100, Less Than 250
SO <sub>2</sub>	Less Than 100
VOC	Greater Than 250
CO	Less Than 100
NO <sub>x</sub>	Less Than 100

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon information in the Technical Support Document for SSM 039-16081-00157.

**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.

Pollutant	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO <sub>x</sub> (tons/yr)
Proposed Modification (Future Limited Potential to Emit)	6.15	6.15	0.033	45.2	4.64	5.52
Contemporaneous Increases (EU-01, Hardwoods, Limited Potential to Emit From Increased Throughput)	1.89	1.89	--	9.91	--	--
Contemporaneous Decreases (2001, 2002 Past Actuals)	-1.75	-1.75	--	-16.5	--	--
Net Emissions	6.29	6.29	0.033	38.6	4.64	5.52
PSD Significant Level	25	15	40	40	100	40

The 1.89 tons of PM/PM<sub>10</sub> per year is the potential-to-emit after controls and limits of EU-01 and does not include the 1.1 tons of PM/PM<sub>10</sub> per year from the existing capacity.

This modification to an existing major stationary source is not major because the emissions increases are limited to less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2,

the PSD requirements do not apply.

### **Federal Rule Applicability**

- (a) Although this significant modification does involve a pollutant-specific (VOC) emissions unit with the potential to emit in an amount equal to or greater than one hundred (100) tons per year tons per year, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable because a control device is not needed in order for the VOC emissions to comply with the limitations of the proposed approval. The potential to emit PM and PM<sub>10</sub> is less than one hundred (100) tons per year from each emission unit in this modification. Therefore, the requirements of 40 CFR Part 64 are also not applicable for PM and PM<sub>10</sub>.
- (b) The hardwoods (EU-01) will continue to be subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJ, (National Emission Standards for Wood Furniture Manufacturing Operations) because this source is a major source of HAPs as defined in 40 CFR Part 63.2 and it assembles objects made of solid wood and then applies various stains, sealers, lacquers, adhesives, enamels, and sealants to the wood. These operations meet the wood furniture and wood furniture component definitions in 40 CFR Part 63.801 since they qualify as "any product made of wood" or "any part that is used in the manufacturer of wood furniture", respectively. It does not meet the definition of incidental wood furniture since it uses more than one hundred (100) gallons per month of finishing material and adhesives. Further, the source does not qualify as an area source as specified in 40 CFR Part 63.800(b)(1), (b)(2), or (b)(3). Since the source does not qualify as either an incidental wood furniture manufacturer or area source, the wood furniture and wood furniture component manufacturing and surface coating operations at Newmar Corporation are therefore still subject to the requirements of 40 CFR Part 63.808, Subpart JJ" National Emissions Standards for Wood Furniture Manufacturing Operations.
- (c) The motor homes and travel trailers are not automobiles or light duty trucks according to 40 CFR 60.391. Therefore, the requirements of 326 IAC 12 (40 CFR 60.390, Subpart MM), are not applicable.
- (d) The metal surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart M MMMM. Frame painting (EU-03) and undercoating (EU-08) are considered existing facilities pursuant to 40 CFR 63.3882, because miscellaneous metal parts surface coating has been previously performed at the source. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart M MMMM for Surface Coating of Miscellaneous Metal Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>, and will be published in the *Federal Register*.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section, except when otherwise specified in 40 CFR 63 Subpart M MMMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At

that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart M, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of January 2, 2004.
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

### **State Rule Applicability - Individual Facilities**

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

The existing source has been a major PSD source since the issuance of SSM 039-16081-00157, issued on October 4, 2002. This modification is a minor PSD modification to an existing PSD source which has not undergone PSD review. In order for this modification to be a minor modification, the following emission limits need to be met:

- (a) The VOC delivered to the applicators of frame painting (EU-03) will not exceed 32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC delivered to the applicators of frame undercoating (EU-08) will not exceed 12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The VOC delivered to the applicators of hardwoods (EU-01) will not exceed 67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The Permittee will also comply with the existing VOC limit from the Part 70 Operating Permit in Condition D.1.1(c) that stated:

The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3, FRP Booth, the undercoating spray booth, and insignificant activities, shall be limited to less than 156 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

This limit will be revised in two phases. The first phase will add an additional 9.91 tons of VOC per year to this limit to account for the increase in production of the Hardwoods (EU-01). This phase does not require any netting credit from the removal of existing emission units. The second phase will add a limited future potential to emit of 32.47 tons per year of VOC for the frame painting (EU-03) and 12.68 tons per year for the undercoating (EU-08). This is in addition to the 9.91 ton per year increase in the VOC limit due to the increase in capacity of the Hardwoods (EU-01). This second phase limit will take into account the netting credit of 16.54 tons per year of VOC. Therefore, the first phase limit will be 156 +

$9.91 = 165.91$  tons per year and the second phase limit will be  $156 + 32.47 + 12.68 + 9.91 - 16.54 = 194.53$  tons per year. A condition will be added to the permit in Sections D.1, D.3 and D.10 that requires the removal of the existing emission units (EU-03 and EU-08) prior to the operation of the proposed new emission units (EU-03 and EU-08).

- (e) The potential the emit PM and PM<sub>10</sub> from this modification is less than the PSD Significant thresholds of 25 and 15 tons per year, respectively after accounting for the net emissions reductions resulting from the removal of the existing welding, frame painting (EU-03) and the frame undercoating operations (EU-08). The net potential to emit of PM and PM<sub>10</sub> for this modification is as follows:

Future Potential to Emit After Controls (no production limits)

Welding 3.65 tons per year, see page 3 of Appendix A

Frame painting (EU-03) 9.65 tons per year, see page 1 of Appendix A (96.5 tons per year with 90% control)

Undercoating (EU-08) 2.10 tons per year, see page 1 of Appendix A (21.0 tons per year with 90% control)

Natural Gas Combustion 0.419 tons per year, see page 4 of Appendix A

Increase in capacity of the hardwoods operation (EU-01) 0.888 see page 2 of Appendix A.

Equivalent to a sum of:  $3.65 + 9.65 + 2.10 + 0.419 + 0.888 = 16.71$  tons per year

Accounting for the netting credit of 1.75 tons per year results in a net increase in the potential to emit of PM and PM<sub>10</sub> of 14.96 tons per year.

This net increase in the potential to emit PM and PM<sub>10</sub> represents the full controlled potential to emit and does not reflect the VOC usage limits. These potential PM and PM<sub>10</sub> emissions assume a transfer efficiency of 75% and a very conservative capture efficiency of 90%. The specifications for the dry filters in all three (3) surface coating operations exceed a removal efficiency of 99%. Therefore the Permittee will be required to operate the dry filters at all times that the surface coating operations are being conducted in EU-01, EU-03 and EU-08.

### 326 IAC 2-4.1-1 (New source toxics control)

The frame undercoating (EU-08) operation to be constructed in 2004 does not have any HAPs. Thus, EU-08 is not subject to the requirements of this rule.

Since the frame painting and dip tank operation (EU-03) to be constructed in 2004 will not produce finished product by themselves, the requirements of this rule will not be applicable to this emission unit.

The proposed increase in capacity of the hardwoods (EU-01) operation is also not subject to the requirements of this rule because the hardwoods (EU-01) operation was originally constructed in 1982, prior to the July 27, 1997 applicability date of this rule.

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

Since the welding area potentially utilizes more than 625 pounds of wire/rod per day, the particulate matter (PM) from the welding area (EU-09) shall be limited by the following:

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

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

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

- (a) Pursuant to T 039-7571-00157, issued on October 18, 1999, and 40 CFR 52 Subpart P, the particulate matter (PM) from the hardwoods (EU-01) shall be limited by the following:

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

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

- (b) Pursuant 40 CFR 52 Subpart P, the particulate matter (PM) from the frame painting and undercoating operations (EU-03 and EU-08) shall be limited by the following:

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

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the frame painting (EU-03) and the frame undercoating (EU-08) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm 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.

Based on the MSDS submitted by the source and calculations made, the one (1) frame painting operation, identified as EU-03, and the one (1) frame undercoating operation, identified as EU-08 are in compliance with this requirement.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating in the hardwoods (EU-01) applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

The hardwoods operation using HVLP spray applicators complies with the requirement of this rule.

### 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 EU-01 (Hardwoods), the one (1) frame painting operation (EU-03) and the one (1) frame undercoating operation (EU-08) are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV1-1, SV1-2, SV-91, SV-3.1a, SV-3.1b, SV-3.1c, SV-3.1d, SV-3.2a, SV-3.2b, SV-3.2c, SV-3.2d, SV-8.1a, SV-8.1b, SV-8.1c, SV-8.1d, SV-8.2a, SV-8.2b, SV-8.2c, and SV-8.2d while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and

Reports, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and to make the requirements of 326 IAC 2-2 (PSD) not applicable.

### Proposed Changes

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

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

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

- (a) EU-01(Hardwoods)  
One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLP spray guns, for coating of interior wood components with a maximum capacity of **3.56** ~~four (4)~~ recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)  
One (1) Dip Tank, with a capacity of **3.56** ~~four (4)~~ units per hour, exhausting to general ventilation. (1982)
- (c) ~~EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)~~  
**One (1) frame painting operation, identified as EU-03, consisting of:**
  - (1) **Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-3.1a, SV-3.1b, SV-3.1c, SV-3.1d, SV-3.2a, SV-3.2b, SV-3.2c, and SV-3.2d, constructed in 2004, capacity: 3.56 units per hour, total.**
  - (2) **One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.**

- (h) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;
- (i) One (1) diesel engine Test Cell with a capacity of 260 horsepower;
- (j) ~~One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;~~  
**One (1) welding area, consisting of 56 MIG welding stations (carbon steel), capacity: 1.05 pounds per hour of wire per station and 15 MIG welding stations (aluminum), capacity: 0.185 pounds per hour of wire per station, identified as EU-09, constructed in 2004.**
- (k) One (1) water based frame paint booth with rate of production as 0.1 unit per hour; and
- (l) ~~One (1) undercoating booth, identified as EU-08, using an airless spray application system, coating a maximum of 2.5 wood and metal chassis per hour, exhausting to the general ventilation.~~  
**One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-8.1a, SV-8.1b, SV-8.1c, SV-8.1d, SV-8.2a, SV-8.2b, SV-8.2c, and SV-8.2d, constructed in 2004, capacity: 3.00 units per hour.**
- (m) Three (3) natural gas fired furnaces, rated at 0.60 million British thermal units per hour, each.
- (n) Four (4) natural gas fired air make-up units, rated at 2.70 million British thermal units per hour, each.

#### SECTION D.1 FACILITY OPERATION CONDITIONS

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

EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLV) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLV spray guns, for coating of interior wood components with a maximum capacity of **3.56** ~~four (4)~~ recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)

One (1) Dip Tank B-1 with a capacity of **3.56** ~~four (4)~~ units per hour, exhausting to general ventilation. (1982)

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

##### D.1.1 Volatile Organic Compounds (Wood Furniture and Cabinet Coating) [326 IAC 8-2-12] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood components in paint areas identified as B-1 and B-2, shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

- (b) High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (c) The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3 (**existing frames**) the, FRP Booth, the **existing** undercoating spray booth, and insignificant activities, shall be limited to less than ~~456~~ **165.91** tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) **The input VOC to the paint areas B-1 and B-2 and the usage of cleanup solvent for the paint areas B-1 and B-2 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**
- (e) **The input of VOC to EU-01 (Hardwoods) shall not exceed 67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

D.1.12 Record Keeping Requirements [326 IAC 14][40 CFR Part 63.806]

- (a) To document compliance with Conditions D.1.1(c), **D.1.1(d) and D.1.1(e)** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(c).
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the months of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with condition D.1.9 and D.1.10, the Permittee shall maintain a

copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) The owner or operator of the spray paint areas B-1 and B-2 shall fulfill all record keeping requirements of § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.
- (d) The owner or operator of the spray paint areas B-1 and B-2 subject to the emission limits in Condition D.1.3 of this permit shall maintain records of the following:
  - (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in § 63.802; and
  - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802; and
  - (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in § 63.802 (b)(3).
- (e) The owner or operator of the spray paint areas B-1 and B-2 shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
  - (1) Records demonstrating that the operator training program required by § 63.803(b) is in place;
  - (2) Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);
  - (3) Records associated with the cleaning solvent accounting system required by § 63.803(d);
  - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by § 63.803(h)(5).
  - (5) Records associated with the formulation assessment plan required by § 63.803(l);  
and
  - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) The owner or operator of the spray paint areas B-1 and B-2 subject to the emission limits in D.1.3 and following the compliance provisions of § 63.804(f) (3), and § 63.804(g)(3)(I), shall maintain records of the compliance certifications submitted in accordance with § 63.807(c) for each semiannual period following the compliance date.
- (g) The owner or operator of the spray paint areas B-1 and B-2 shall maintain records of all other information submitted with the compliance status report required by § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).

- (h) The owner or operator of the spray paint areas B-1 and B-2 shall maintain all records in accordance with the requirements of § 63.10(b)(1).
- (i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements [326 IAC 14] [40 CFR Part 63.807]

- (a) A quarterly summary of the information to document compliance with Conditions **D.1.1(c)**, **D.1.1(d)** and **D.1.1(e)**, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) The owner or operator of the spray paint areas B-1 and B-2 subject to this subpart shall fulfill all reporting requirements of § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.
- (c) The owner or operator of the spray paint areas B-1 and B-2 demonstrating compliance in accordance with § 63.804(f) (3) shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by § 63.804(f) (3) of this subpart and submitted to the address listed in Section C - General Reporting Requirements, of this permit.
- (d) The owner or operator of the spray paint areas B-1 and B-2 demonstrating compliance in accordance with § 63.804(g) (3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
  - (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
  - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
  - (3) The semiannual reports shall include the information required by § 63.804(g) (3), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
  - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

The report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLV) spray application for coating metal frames, identified as EU-03 (Frame Shop), with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

One (1) frame painting operation, identified as EU-03, consisting of:

- (1) Two (2) spray paint booths, identified as EU-03.1 and EU-03.2, each equipped with high volume low pressure (HVLV) spray applicators and dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-3.1a, SV-3.1b, SV-3.1c, SV-3.1d, SV-3.2a, SV-3.2b, SV-3.2c, and SV-3.2d, constructed in 2004, capacity: 3.56 units per hour, total.
- (2) One (1) dip tank, identified as EU-03.3, constructed in 2004, capacity: 3.56 units per hour.

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

##### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (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 M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

##### D.3.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal 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/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

- (1) All coating operations as defined in 40 CFR 63.3981;
  - (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 63.3980, and are applicable to the affected source.

D.3.43 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, the volatile organic compound (VOC) content of coatings applied to metal frames in the paint booth identified as B-3 shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Extreme Performance Coat	3.50

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the Spray Paint Booth B-3 (**existing frames**) and the usage of cleanup solvent for the Spray Paint Booth B-3 (**existing frames**) (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2, the FRP Booth, the **existing** undercoating spray booth, and insignificant activities, shall be limited to less than ~~156~~ **165.91** tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input VOC to the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, and the usage of cleanup solvent for the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, and the one (1) dip tank, identified as EU-03.3 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, Spray Booth B-2, the FRP Booth, the frame undercoating operation, identified as EU-08, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) The input of VOC to the one (1) frame painting operation (EU-03) shall not exceed 32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (f) **The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.**

**D.3.24 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3 (Process Operations), the **two (2) spray paint booths, identified as EU-03.1 and EU-03.2** paint booth identified as ~~B-3~~ shall have a PM allowable emissions using the following equation:

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

where E = PM allowable emissions in pounds per hour  
P = Process weight rate in tons per hour

**D.3.35 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 any control devices.

**Compliance Determination Requirements**

**D.3.46 Volatile Organic Compounds**

Compliance with the VOC content and usage limitations contained in Conditions D.3.43 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 8-1-2 (a) (7) using formulation data supplied by the coating manufacturer. However, IDEM, OAQM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.3.57 VOC Emissions**

Compliance with Conditions D.3.43(c), **D.3.3(d) and D.3.3(e)** shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements**

**D.3.68 Particulate Matter (PM)**

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

**D.3.79 Training Requirements**

- (a) The Permittee shall implement an operator training program.
- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operating shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion . Copies of the training program, the list of trained operators

and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (3) All operators shall be given refresher training annually.
- (b) Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.3.810 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.43, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.43.
  - (1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the months of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:  
$$A = \frac{\sum (C * U)}{\sum U} \# 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon  
C = VOC content of coating in pounds VOC per gallon  
U = usage rate of coating in gallons per day
  - (5) The total VOC usage for each month;
  - (6) The total HAP usage for each month;
  - (7) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.3.68 and D.3.79, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.3.911 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.3.43(c), **D.3.3(d) and D.3.3(e)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**D.3.12 Notification Requirements [40 CFR 63.3910]**

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification 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 Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

**D.3.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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

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

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

**SECTION D.10**

**FACILITY OPERATION CONDITIONS**

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

- ~~(i) One (1) undercoating booth, identified as EU-08, using an airless spray application system, coating a maximum of 2.5 wood and metal chassis per hour, exhausting to the general ventilation.~~
- (i) **One (1) frame undercoating operation, identified as EU-08, consisting of two (2) spray paint booths, identified as EU-08.1 and EU-08.2, using an airless spray application system, equipped with dry filters for particulate control, exhausting to eight (8) stacks, identified as SV-8.1a, SV-8.1b, SV-8.1c, SV-8.1d, SV-8.2a, SV-8.2b, SV-8.2c, and SV-8.2d, constructed in 2004, capacity: 3.00 units per hour.**

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

**D.10.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]**

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- (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 M. The Permittee must comply with these requirements on and after January 2, 2004.
  - (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

**D.10.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]**

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- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal 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/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
  - (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
  - (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
    - (1) All coating operations as defined in 40 CFR 63.3981;
    - (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 63.3980, and are applicable to the affected source.

**D.10.43 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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The PM from the ~~undercoating booth~~ **frame undercoating operation, identified as EU-08**, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.10.24 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 2-2]**

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- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in the ~~undercoating booth~~ **frame undercoating operation, identified as EU-08**, shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried or forced warm air dried coatings.
- (b) Solvent sprayed from the application equipment during clean up 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.
- (c) The input VOC to the **existing** undercoating spray booth in combination with input VOC from Spray Booths B-1, B-2, B-3, FRP Booth, and insignificant activities, shall be limited to less than ~~456~~**165.91** tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) **The input VOC to the frame undercoating operation, identified as EU-08, and the usage of cleanup solvent for the frame undercoating operation, identified as EU-08 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from the two (2) spray paint booths, identified as EU-03.1 and EU-03.2, one (1) dip tank, identified as EU-03.3, Spray Booth B-1, Spray Booth B-2, the FRP Booth, and insignificant activities, shall be limited to less than 194.53 tons per 12 consecutive month period. This limitation will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**
- (e) **The input of VOC to the frame undercoating operation, identified as EU-08, shall not exceed 12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (f) **The existing frame painting operation (EU-03) and the existing frame undercoating operation (EU-08) shall be taken out of service prior to the start up of the frame painting operation (EU-03) and the frame undercoating operation (EU-08), reconstructed in 2004.**

**Compliance Determination Requirements**

**D.10.35 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content limitation contained in Condition D.10.24 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQM, 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**

### **D.10.6 Particulate Matter (PM)**

**The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.**

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

### **D.10.47 Record Keeping Requirements**

- (a) To document compliance with Condition D.10.24, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.24.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the month of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.10.8 Reporting Requirements**

**A quarterly summary of the information to document compliance with Condition D.10.4, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

### **D.10.9 Notification Requirements [40 CFR 63.3910]**

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification 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 Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

**D.10.10 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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

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

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

The Quarterly Report Form has been revised as shown at the end of this Technical Support Document.

**Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-18599-00157 and Significant Permit Modification No. 039-18697-00157.

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

**Part 70 Quarterly Report**

Source Name: Newmar Corporation  
 Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030  
 Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030  
 Part 70 Permit No.: T 039-7571-00157  
 Facility: Entire Source  
 Parameter: VOC usage (tons)  
 Limit: 138.28 tons per twelve (12) consecutive month period from BR-1, BR-2, BR-3, BR-4 and BR-5;  
 70 tons per twelve (12) consecutive month period from B-2a and B-2b; and  
**Phase 1: <del>156</del> 165.91 tons per twelve (12) consecutive month period from Spray Booths B-1, B-2, B-3 (existing frames), FRP Booth, the existing undercoating spray booth, and insignificant activities;**  
**Phase 2: <del>194.53</del> tons per twelve (12) consecutive month period from Spray Booths B-1 and B-2, in combination with Spray Booths EU-03.1, EU-03.2, dip tank EU-03.3, FRP booth, frame undercoating operation (EU-08) and insignificant activities**  
**67.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month from EU-01 (Hardwoods);**  
**32.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month from frame painting operation (EU-03); and**  
**12.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month from frame undercoating operation (EU-08).**

This form consists of 2 pages

Page 1 of 2

Month: \_\_\_\_\_

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 through BR-5	138.28			
Paint Booths B-2a and B-2b	70			
<b>Phase 1: Spray Booths B-1, B-2, and B-3(existing frames), FRP booth, the existing undercoating spray booth, and other emissions from insignificant activities</b>	<b>&lt; del&gt;156&lt;/del&gt;165.91</b>			
<b>Phase 2: Spray Booths B-1, B-2, Spray Paint Booths EU-03.1 and EU-03.2, Dip Tank EU-03.3, FRP Booth, the Frame Undercoating Operation (EU-08), and insignificant activities</b>	<b>&lt;del&gt;194.53&lt;/del&gt;</b>			

This form consists of 2 pages

page 2 of 2

Month: \_\_\_\_\_

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
<b>EU-01 (Hardwoods)</b>	<b>67.5</b>			
<b>Frame Painting Operation (EU-03)</b>	<b>32.47</b>			
<b>Frame Undercoating Operation (EU-08)</b>	<b>12.68</b>			

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**EU-03 and EU-08, Including Dip Tank at EU-03**  
\*Note, These Coatings Contain No HAPs

**Company Name: Newmar Corporation**  
**Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46650-0030**  
**SSM Number: 039-18599**  
**Plt ID: 039-00157**  
**Reviewer: Craig J. Friederich**  
**Application Date: January 9, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>EU-08</b>																
161 Undercoating	8.01	41.500%	0.0%	41.5%	0.0%	56.25%	1.36500	3.000	3.32	3.32	13.61	326.70	59.62	21.01	5.91	75%
<b>EU-03</b>																
Black Frame Paint	12.3	28.320%	0.0%	28.3%	0.0%	46.67%	2.80100	3.560	3.49	3.49	34.82	835.66	152.51	96.50	7.48	75%

PM Control Efficiency: 90.00%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Uncontrolled</b>	<b>48.4</b>	<b>1162</b>	<b>212</b>	<b>118</b>
<b>Controlled</b>	<b>48.4</b>	<b>1162</b>	<b>212</b>	<b>11.8</b>

METHODOLOGY

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

<b>Limit EU-08</b>	<b>32.47</b>	<b>0.45</b>
<b>Limit EU-03</b>	<b>12.68</b>	<b>2.05</b>
<b>Total Limit of:</b>	<b>45.15</b>	<b>2.50</b>

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

**Company Name: Newmar Corporation  
Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46650-0030  
SSM Number: 039-18599  
Plt ID: 039-00157  
Reviewer: Craig J. Friederich  
Application Date: January 9, 2004**

**Hardwoods**

\*EU-01 is increasing production by 1.59 units per hour from 1.97 to 3.56 units per hour

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Plastoflex elite	7.84	56.340%	0.0%	56.3%	0.0%	41.04%	0.11000	1.590	4.42	4.42	0.773	18.54	3.38	0.66	10.76	75%
Opticlear 900 Satin	7.68	54.910%	0.0%	54.9%	0.0%	30.00%	0.65000	1.590	4.22	4.22	4.36	104.60	19.09	3.92	14.06	75%
Opticlear 900 35 Sheen	7.66	55.900%	0.0%	55.9%	0.0%	29.16%	0.17300	1.590	4.28	4.28	1.18	28.27	5.16	1.02	14.68	75%
Optiseal 900	7.58	58.89%	0.0%	58.9%	0.0%	19.82%	0.60600	1.590	4.46	4.46	4.30	103.23	18.84	3.29	22.52	75%

PM Control Efficiency: 90.00%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>				<b>Uncontrolled</b>	<b>10.6</b>	<b>255</b>	<b>46.5</b>	<b>8.88</b>
				<b>Controlled</b>	<b>10.6</b>	<b>255</b>	<b>46.5</b>	<b>0.888</b>	
				<b>Limited</b>			<b>9.91</b>	<b>1.89</b>	

METHODOLOGY

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

**Present Actual Capacity Prior to Increase in Capacity of 1.59 units per hour**

**EU01 Hardwoods**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Plastoflex elite	7.84	56.340%	0.0%	56.3%	0.0%	41.04%	0.11000	1.970	4.42	4.42	0.96	22.97	4.19	0.81	10.76	75%
Opticlear 900 Satin	7.68	54.910%	0.0%	54.9%	0.0%	30.00%	0.65000	1.970	4.22	4.22	5.40	129.60	23.65	4.86	14.06	75%
Opticlear 900 35 Sheen	7.66	55.900%	0.0%	55.9%	0.0%	29.16%	0.17300	1.970	4.28	4.28	1.46	35.02	6.39	1.26	14.68	75%
Optiseal 900	7.58	58.89%	0.0%	58.9%	0.0%	19.82%	0.60600	1.970	4.46	4.46	5.33	127.90	23.34	4.07	22.52	75%

PM Control Efficiency: 90.00%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>				<b>Uncontrolled</b>	<b>13.1</b>	<b>315</b>	<b>57.6</b>	<b>11.0</b>
				<b>Controlled</b>	<b>13.1</b>	<b>315</b>	<b>57.6</b>	<b>1.10</b>	
				<b>Overall Limit For EU01</b>			<b>67.5</b>	<b>2.99</b>	

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** Newmar Corporation  
**Address City IN Zip:** 355 North Delaware Street, Nappanee, IN 46550-0030  
**SSM Number:** 039-18599  
**Plt ID:** 039-00157  
**Reviewer:** Craig J. Friederich  
**Application Date:** January 9, 2004

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
<b>WELDING</b>												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	56	1.05		0.0055	0.0005			0.323	0.029	0.000	0	0.029
Stick (E7018 electrode)	15	0.185		0.184	0.0009			0.511	0.002	0.000	0	0.002
Tungsten Inert Gas (TIG)(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0			0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.83				0.03
Potential Emissions lbs/day								20.02				0.77
Potential Emissions tons/year								3.65				0.14

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting".

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**3 Furnaces  
 0.6MMBtu/hr, each**

**4 Make Up Units  
 2.7 MMBtu/hr, each**

**Company Name: Newmar Corporation  
 Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46650-0030  
 SSM Number: 039-18599  
 Pit ID: 039-00157  
 Reviewer: Craig J. Friederich  
 Application Date: January 9, 2004**

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

12.60

110

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.105	0.419	0.033	5.52	0.304	4.64

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

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

**Company Name: Newmar Corporation**  
**Address City IN Zip: 355 N. Delaware Street, Nappanee, IN 46650-0030**  
**SSM Number: 039-18599**  
**Pit ID: 039-00157**  
**Reviewer: Craig J. Friederich**  
**Application Date: January 9, 2004**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0001	0.0001	0.004	0.099	0.0002

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	<b>Total</b>
Potential Emission in tons/yr	0.0000	0.0001	0.0001	0.00002	0.0001	<b>0.104</b>

Methodology is the same as page 4.

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