



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 2, 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 / SPM 039-18697-00157

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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September 2, 2004

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

Re: 039-18697
Fourth Significant Permit Modification to
Part 70 No.: T 039-7571-00157

Dear Mr. Parks.:

Newmar Corporation was issued a permit on October 18, 1999 for a stationary motor home and travel trailer manufacturing source. A letter requesting changes to this permit was received on January 9, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the removal of 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, and installing combustion units to heat the new building. 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 changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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, please 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, Chief
Permits Branch
Office of Air Quality

Attachments

CJFMES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch
Administrative and Development
Technical Support and Modeling - Michelle 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.

Operation Permit No.: T039-7571-00157	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 18, 1999

First Administrative Amendment 039-11533 issued on December 17, 1999
 First Significant Source Modification 039-11239, issued on December 28, 1999
 Second Significant Source Modification No.: 039-12223, issued on August 1, 2000
 Second Administrative Amendment 039-12485 issued on September 18, 2000
 First Significant Permit Modification No.: 039-12798, issued February 6, 2001
 Third Significant Source Modification No.: 039-14882, issued on February 26, 2002
 Second Significant Permit Modification No.: 039-15355, issued on March 13, 2002
 Third Administrative Amendment No.: 039-15642, issued on June 5, 2002
 Fourth Significant Source Modification No. 039-16081-00157, issued on October 4, 2002
 Third Significant Permit Modification No. 039-16219-00157, issued on October 30, 2002
 Fifth Significant Source Modification No. 039-18599-00157, pending

Fourth Significant Permit Modification 039-18697-00157	Sections Affected: A.2, B.28, D.1, D.3, D.9, D.10, and the Quarterly Report Forms
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 2, 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.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)]

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)]

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 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 (HVLP) 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 (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.
- (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)]

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]

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).

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

B.28 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

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

SECTION 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 (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 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 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, 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).

- (b) The owner or operator of the spray paint area B-1 that are complying through the procedures established (a)(1) and are applying coatings using continuous coaters shall demonstrate initial compliance by:
- (1) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
 - (2) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.
- (c) The owner or operator of the paint booth in Condition D.1.3, shall submit an initial compliance status report, as required by § 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.
- (d) The owner or operator of the paint booth that is complying through the procedures established in § 63.804 (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures:
- (1) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated records, using compliant thinners, and submitting a compliance certification with the semiannual report required by § 63.807(c).
 - (2) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The spray paint area B-1 is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - (3) The compliance certification shall be signed by a responsible official of the company that owns or operates the spray paint area B-1.

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.

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

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) 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

D.3.5 VOC Emissions

Compliance with Condition D.3.1(c) 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 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 Condition D.3.3(c) 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.3.8 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the paint booth identified as B-3 is in operation.

D.3.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks 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 an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.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:

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

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.3.8 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 Condition D.3.3(c), 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 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

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 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

**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).

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			
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			

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)
EU-01 (Hardwoods)	67.5			
Frame Painting Operation (EU-03)	32.47			
Frame Undercoating Operation (EU-08)	12.68			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

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

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 (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 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 ₁₀	130
SO ₂	0.033
VOC	259
CO	4.64
NO _x	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 PM₁₀ 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 ₁₀	attainment
SO ₂	attainment
NO ₂	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 ₁₀	Greater Than 100, Less Than 250
SO ₂	Less Than 100
VOC	Greater Than 250
CO	Less Than 100
NO _x	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 ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (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/PM₁₀ per year is the potential-to-emit after controls and limits of EU-01 and does not include the 1.1 tons of PM/PM₁₀ 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 PM₁₀ 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 PM₁₀.
- (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 PM₁₀ 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 PM₁₀ 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 PM₁₀ of 14.96 tons per year.

This net increase in the potential to emit PM and PM₁₀ represents the full controlled potential to emit and does not reflect the VOC usage limits. These potential PM and PM₁₀ 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)]

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 (HVL) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVL 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 (HVL) 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 (HVL) 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 (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 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)(l), 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 (HVL) 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 (HVL) 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 **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 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

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

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

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 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

SECTION D.10 FACILITY OPERATION CONDITIONS

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

- ~~(f) 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.~~
- (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.**

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 Mmmm] [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.10.13 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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]

-
- (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)

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]

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**

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: 156 165.91 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).

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			
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	< del>156165.91			
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			

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)
EU-01 (Hardwoods)	67.5			
Frame Painting Operation (EU-03)	32.47			
Frame Undercoating Operation (EU-08)	12.68			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

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

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)]

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;~~
- (cb) 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.

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 "15th 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 under-

- coating 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;
- (cb) 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, OAM 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	42,250 12,375	Ambient
SV-3.1b	Frame Painting	36.0	2.83	42,250 12,375	Ambient
SV-3.1c	Frame Painting	36.0	2.83	42,250	Ambient
SV-3.1d	Frame Painting	36.0	2.83	42,250	Ambient
SV-3.2a	Frame Painting	36.0	2.83	42,250 12,375	Ambient
SV-3.2b	Frame Painting	36.0	2.83	42,250 12,375	Ambient
SV-3.2c	Frame Painting	36.0	2.83	42,250	Ambient
SV-3.2d	Frame Painting	36.0	2.83	42,250	Ambient
SV-8.1a	Undercoating	36.0	2.83	42,250 9,000	Ambient
SV-8.1b	Undercoating	36.0	2.83	42,250 9,000	Ambient
SV-8.1c	Undercoating	36.0	2.83	42,250	Ambient
SV-8.1d	Undercoating	36.0	2.83	42,250	Ambient
SV-8.2a	Undercoating	36.0	2.83	42,250 9,000	Ambient
SV-8.2b	Undercoating	36.0	2.83	42,250 9,000	Ambient
SV-8.2c	Undercoating	36.0	2.83	42,250	Ambient
SV-8.2d	Undercoating	36.0	2.83	42,250	Ambient
SV-3.4	Paint Storage Room	36.0	1.00	1,000	Ambient

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 (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.**

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.

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

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.28 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

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

Newmar Corporation
Nappanee, Indiana
Permit Reviewer: CJF/MES

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