



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 17, 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: SunnyBrook RV, Inc. / SPR 039-19129-00444
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.

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September 17, 2004

Mr. Elvie Frey
SunnyBrook RV, Inc.
11756 County Road 14
Middlebury, IN 46540

Re: 039-19129
Significant Permit Modification to
Part 70 Renewal Permit No.: 039-16458-00444

Dear Mr. Frey:

SunnyBrook RV, Inc. was issued a Part 70 permit renewal on November 17, 2003, for a stationary towable recreational vehicle manufacturing source. A letter requesting a modification was received on May 7, 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.

This modification relates to the incorporation of the original BACT requirements that were established in the Part 70 Permit No. 039-7803-00444, issued on October 12, 1998, in the Part 70 Renewal Permit No. T039-16458-00444, issued on November 17, 2003.

The changes made in the Part 70 Operating Permit Renewal are presented in the attached 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 Seema Roy, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3419, or in Indiana at 1-800-451-6027.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SR / EVP

cc: File – Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Tony Pelath
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner





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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**SunnyBrook RV, Inc.
201 14th Street
Middlebury, Indiana 46540**

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

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

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

Operation Permit No.: T039-16458-00444	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 17, 2003

First Administrative Amendment 039-18516-00444, issued on February 20, 2004

First Significant Permit Modification No.: 039-19129	Pages Modified: 24 and 25
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 17, 2004

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

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

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

- (a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);
- (b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;
- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (d) Limit total VOC input to each facility as follows:
 - (1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.
 - (2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.
- (e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

There is no compliance monitoring requirements.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any 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.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	SunnyBrook RV, Inc.
Source Location:	201 14 th Street, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T039-16458-00444
Operation Permit Issuance Date:	November 17, 2003
Significant Permit Modification No.:	039-19129-00444
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from SunnyBrook RV, Inc. relating to the change of BACT requirements in the Part 70 Permit Renewal No. T039-16458-00444, issued on November 17, 2003.

History

SunnyBrook RV, Inc. was issued a Part 70 permit renewal on November 17, 2003, for a stationary towable recreational vehicle manufacturing source. Pursuant to 326 IAC 8-1-1 (Applicability), once a facility becomes subject to any of the rules under Article 8, such facility shall remain subject to that rule notwithstanding any subsequent decrease in VOC emissions unless the provisions of subsections 326 IAC 8-1-1 (b) through (d) are met or alternative limitations and requirements have been streamlined in a Part 70 Permit in accordance with 326 IAC 2-7-24. However, the Part 70 permit renewal no. T039-16458-00444 erroneously changed the BACT requirements, which were established in the Part 70 Permit No. 039-7803-00444, issued on October 12, 1998, by reducing allowable VOC emissions from the Glue Operation (FUG26, FUG39, FUG40 and FUG44). This significant permit modification will incorporate the original BACT requirements that were established in the Part 70 Permit No. 039-7803-00444 into the Part 70 renewal no. T039-16458-00444. In addition, the original BACT requirements (Section (a)) will be modified as follows to give source the flexibility of opting for a more environmentally beneficial (better solid transfer efficiency) application equipment in the future:

- (a) Utilize air atomized spray **or more environmentally beneficial (better solid transfer efficiency) application** equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);

Sections D.1.1 and D.1.2 have been modified as follows:

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) ~~for the Sealant & Adhesive Usage (FUG50, FUG52 and FUG53)~~ is as follows:

- (a) **Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);**
- ~~(a)~~ (b) **Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage-, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;**
- ~~(b)~~ (c) **Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup.** Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- ~~(c)~~ (d) **Any change or modification to the plant-wide usage of Sealants & Adhesives (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation that may increase the PTE of VOC to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6. Limit total VOC input to each facility as follows:**
 - (1) **The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.**
 - (2) **The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.**
- ~~(d)~~ (e) The equipment and work practice standards listed in (a) through ~~(c)~~ (d) shall be used at all times of facility operations.

~~D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~Any change or modification to the Glue Operation (FUG26, FUG39, FUG40 and FUG44) that may increase the PTE of VOC to more than 25 tons per year from each, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.~~

Existing Approvals

The source has been operating under the Part 70 permit renewal T039-16458-00444, issued on November 17, 2003, with an expiration date of November 17, 2008, and the following amendments and revisions:

- (a) First Administrative Amendment 039-18516-00444, issued on February 20, 2004

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

Justification for Modification

The Title V permit is being modified through a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states that significant modification procedures shall be used for applications requesting Part 70 permit modifications that do not qualify as minor permit modifications or as administrative amendments.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

The proposed changes do not trigger any new or alter any existing NSPS.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAP):

The proposed changes do not trigger any new or alter any existing NESHAP.

State Rule Applicability, Entire Source:

The proposed changes do not trigger any new or alter any existing entire source state rules.

State Rule Applicability, Individual Facilities:

Conditions D.1.1 and D.1.2 shall be revised as follows to reflect the new BACT requirements.

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Sealant & Adhesive Usage (FUG50, FUG52 and FUG53) is as follows:

- (a) **Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);**
- ~~(b)~~ (b) **Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;**
- ~~(c)~~ (c) **Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup.** Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;

~~(e)~~ **(d)** Any change or modification to the plant-wide usage of Sealants & Adhesives (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation that may increase the PTE of VOC to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6. **Limit total VOC input to each facility as follows:**

(1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.

(2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.

~~(d)~~ **(e)** The equipment and work practice standards listed in (a) through ~~(e)~~ **(d)** shall be used at all times of facility operations.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

~~Any change or modification to the Glue Operation (FUG26, FUG39, FUG40 and FUG44) that may increase the PTE of VOC to more than 25 tons per year from each, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.~~

Compliance Determination Requirements:

The proposed changes do not trigger any new or alter any existing compliance determination requirements.

Compliance Monitoring Requirements:

The proposed changes do not trigger any new or alter any existing compliance monitoring requirements.

Record Keeping Requirements:

The record keeping requirements have been revised as follows:

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 ~~and D.1.2~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 ~~and D.1.2~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition ~~D.1.3~~ **D.1.2**, the Permittee shall maintain records of any 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.

Reporting Requirements:

The proposed changes do not trigger any new or alter any existing reporting requirements.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit Renewal No. T039-16458-00444, issued on November 17, 2003.

1. Section D.1 has been revised as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

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

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Sealant & Adhesive Usage (FUG50, FUG52 and FUG53) is as follows:

- (a) **Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);**
- ~~(a)~~ (b) **Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage-, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;**
- ~~(b)~~ (c) **Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup.** Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- ~~(c)~~ (d) **Any change or modification to the plant-wide usage of Sealants & Adhesives (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation that may increase the PTE of VOC to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6. Limit total VOC input to each facility as follows:**
- (1) **The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.**
 - (2) **The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.**
- ~~(d)~~ (e) The equipment and work practice standards listed in (a) through ~~(c)~~ (d) shall be used at all times of facility operations.

~~D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

Any change or modification to the Glue Operation (FUG26, FUG39, FUG40 and FUG44) that may increase the PTE of VOC to more than 25 tons per year from each, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

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

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

Compliance Determination Requirements

~~D.1.4 3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]~~

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

There is no compliance monitoring requirements.

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

D.1.5 4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 ~~and D.1.2~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 ~~and D.1.2~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition ~~D.1.3~~ **D.1.2**, the Permittee shall maintain records of any 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.

Conclusion

The operation of this stationary towable recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-19129-00444.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Permit Modification

Source Name:	SunnyBrook RV, Inc.
Source Location:	201 14th Street, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T039-16458-00444
Operation Permit Issuance Date:	November 17, 2003
Significant Permit Modification No.:	039-19129-00444
Permit Reviewer:	Seema Roy/EVP

On July 8, 2004, the Office of Air Quality (OAQ) had a notice published in "The ElkhartTruth" in Elkhart, Indiana, stating that SunnyBrook RV, Inc. had applied for a Significant Modification to their Part 70 Permit issued on November 17, 2003 in which they requested to change of BACT requirements in the Part 70 Permit Renewal No. T039-16458-00444, issued on November 17, 2003. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation 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 should be issued as proposed.

On August 11, 2004, Douglas Elliot of D & B Environmental Services, Inc. submitted comments on behalf of SunnyBrook RV, Inc. on the proposed Significant Permit Modification. The summary of the comments and corresponding responses is as follows:

Comment 1

As we stated earlier, the potential VOC emissions from the insulation panel gluing operation (FUG26, FUG39, FUG40, and FUG44) are below twenty-five tons per year. BACT should not be an issue for this facility.

Response 1

Pursuant to 326 IAC 8-1-1 (Applicability), once a facility becomes subject to any of the rules under Article 8, such facility shall remain subject to that rule notwithstanding any subsequent decrease in VOC emissions unless the provisions of subsections 326 IAC 8-1-1 (b) through (d) are met or alternative limitations and requirements have been streamlined in a Part 70 Permit in accordance with 326 IAC 2-7-24. The Part 70 permit renewal no. T039-16458-00444 erroneously changed the BACT requirements, which were established in the Part 70 Permit No. 039-7803-00444, issued on October 12, 1998, by reducing allowable VOC emissions from the Glue Operation (FUG26, FUG39, FUG40 and FUG44). This significant permit modification will incorporate the original BACT requirements that were established in the Part 70 Permit No. 039-7803-00444 into the Part 70 renewal no. T039-16458-00444. No change has been made a result of this comment. If the Permittee wants to avoid 326 IAC 8-1-6, The Permittee will need to apply for a federally-approved SIP revision that permanently restricts the facilities in question that result in VOC emissions, such as production, hours of operation, or capacity utilization, such that restrictions lower actual emissions before add-on controls to a level below fifteen (15) pounds per day.