



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 14, 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: Monaco Coach Corporation / 039-19474-00182

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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July 14, 2004

Mr. Richard Bond
Monaco Coach Corporation
606 Nelson's Parkway, P.O. Box 465
Wakarusa, Indiana 46573

Re: 039-19474-00182
First Administrative Amendment to
Part 70 039-7511-00182

Dear Mr. Bond:

Monaco Coach Corporation was issued a Part 70 permit on May 5, 2004 for a stationary towable and motorized recreational vehicle manufacturing source. A letter requesting a change was received on June 15, 2004. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11(a)(7), the permit is hereby administratively amended as follows:

Change 1:

Monaco Coach Corporation is replacing the existing cyclone dust collector on the woodworking shop P3-1 with a closed-loop cyclone and baghouse control system. This results in the following changes to the facility descriptions in Sections A.3 and D.5, and the Compliance Determination and Compliance Monitoring conditions in Section D.5:

A.3 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:

- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone and baghouse dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting inside the building to stack D-4

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Woodworking, Sanding, Grinding, and Welding Units
(f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone and baghouse dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting inside the building to stack D-4
(The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.5.3 Particulate Matter (PM)

The dry filters and cyclone **and baghouse** dust collector for PM control shall be in operation and control emissions from the body shop P4-12, woodworking shop P3-1, closed-loop grinding booths DC-FG1 and DC-FG2, and grinding area DC-FG4 at all times that the units are in operation.

D.5.5 Cyclone **and Baghouse** Inspections

An inspection shall be performed each calendar quarter of the cyclone **and baghouse** controlling the woodworking shop P3-1 when venting to the atmosphere. A cyclone **and baghouse** inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.5.6 Cyclone **and Baghouse** Failure Detection

(a) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Change 2:

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. Therefore, the following language will be incorporated into the Part 70 Permit as Condition B.24 to address credible evidence:

B.24 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.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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 Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 20 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

EAL/MES
Attachments

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Monaco Coach Corporation
 2700 S. Nappanee Street
 Elkhart, IN 46573**

(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.: T 039-7511-00182	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 5, 2004 Expiration Date: May 5, 2009
First Administrative Amendment No.: 039-19474-00182	Pages Affected: 2, 5, 7, 20, 55, 57, 58 (58a added)
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 14, 2004

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control particulate matter, and exhausting to stacks SV-7, SV-8, and SV-8A; the units can also perform minor "patch" FRP repair

- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12
- (d) Two (2) paint bays, identified as P4-37 and P4-38, constructed in December 2000, each with a maximum capacity to coat 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-37 and SV-38; the units can also perform minor "patch" FRP repair

Plant 3

- (e) A towable assembly area, which includes caulks, adhesives, paints, and solvents, identified as P3-2, constructed in 1990, with a maximum capacity of 2.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone and baghouse dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting inside the building

Plant 6

- (g) A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, with a maximum capacity of 2.5 units per hour, with no emission control and exhausting to general building exhaust
- (h) A door manufacturing operation, identified as P6-29, constructed in 1990, consisting of three (3) welding stations, with a maximum capacity of 4.5 units/hour, with no emission control and exhausting to general building exhaust
- (i) A paint booth for metal doors, identified as P6-28, constructed in 1997, with a maximum capacity of 4.5 units per hour, using filtered exhaust as particulate control and exhausting to stack SV-28

Customer Service Facilities - Plants 7 & 9

- (j) A customer service facility, constructed in 1990, with miscellaneous caulks, sealants, touch-up metal surface coating and solvent emissions, with no emission control, and exhausting to general building exhaust with a maximum capacity of 2.25 RVs per hour
- (k) A natural gas fired boiler, identified as B1, installed in 1963, with a maximum input capacity of 4.375 MMBtu/hour

Paint /Fiberglass Plant - Plant 5

- (l) A fiberglass mold prep and clean-up operation, identified as P5-1, constructed in 1998, with a maximum capacity of parts which can accommodate 4.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (m) A fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and four
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230

(ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

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

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.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Woodworking, Sanding, Grinding, and Welding Units

Service Paint Area - In-house Plant 4

- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12

In-house Plant 3

- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone and baghouse dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting inside the building

In-house Plant 6

- (g) A welding and metal painting area, identified as P6-6, constructed in 1990, with 30 welders, with a maximum capacity of 2.5 units per hour, with no emission control and exhausting to general building exhaust
- (h) A door manufacturing operation, identified as P6-29, constructed in 1990, consisting of three (3) welding stations, with a maximum capacity of 4.5 units/hour, with no emission control and exhausting to general building exhaust

Paint /Fiberglass Plant - In-house Plant 5

- (q) Two (2) closed loop grinding booths, identified as DC-FG1 and DC-FG2, constructed in 1998, each with a maximum capacity of parts to accommodate 4.5 recreational vehicles per hour, with dry filters to control particulate matter emissions, and exhausting to general building exhaust

Roadmaster Plant - In-house Plant 50

- (t) Seventy two (72) welding stations and ten (10) cutting tables, constructed in May 2000, with a combined maximum capacity of 4.5 chassis per hour, with no emission control

Aftermarket Fiberglass Plant - In-house Plant 8

- (w) A closed loop grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to general building exhaust

Insignificant Activities

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

(The information describing the processes 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.5.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

resolutions achieved through Cause No. 98-A-J-2075.

Compliance Determination Requirements

D.5.3 Particulate Matter (PM)

The dry filters and cyclone and baghouse dust collector for PM control shall be in operation and control emissions from the body shop P4-12, woodworking shop P3-1, closed-loop grinding booths DC-FG1 and DC-FG2, and grinding area DC-FG4 at all times that the units are in operation.

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

D.5.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking shop P3-1 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Once per shift visible emission notations of the wood body shop P4-12 and closed-loop grinding booths DC-FG1 and DC-FG2 stacks' exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.5 Cyclone and Baghouse Inspections

An inspection shall be performed each calendar quarter of the cyclone and baghouse controlling the woodworking shop P3-1 when venting to the atmosphere. A cyclone and baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.5.6 Cyclone and Baghouse Failure Detection

- (a) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the

Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.5.7 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program for the body shop P4-12.
 - (1) All operators that perform buff, FRP repair, paint prep, or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of 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 inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the visible emission notations of the body shop P4-12, woodworking shop P3-1, and the closed-loop grinding booths DC-FG1 and DC-FG2.
- (b) To document compliance with Condition D.5.5, the Permittee shall maintain records of the results of the inspections required and the dates the vents are redirected.
- (c) To document compliance with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

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