



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: February 1, 2006  
RE: Conquest Mini Homes/039-20639-00350  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 1/10/05



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Indianapolis, Indiana 46204-2251  
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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Conquest Mini-Homes/Gulf Stream Coach, Inc.**  
**1701 Century Drive**  
**Goshen, Indiana 46526**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-20639-00350	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: February 1, 2006 Expiration Date: February 1, 2011



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## 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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary RV and travel trailer assembly plant.

Authorized Individual:	President
Source Address:	1701 Century Drive, Goshen, Indiana 46526
Mailing Address:	P.O. Box 1005, Nappanee, Indiana 46550
General Source Phone:	(574) 773-7761
SIC Code:	3716 and 3792
County Location:	Elkhart
Source Location Status:	Nonattainment area for Ozone under 8-hour standards Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) chassis preparation area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or 3.0 travel trailers per hour, equipped with HVLP spray guns, applying coatings to metal substrate, with emissions controlled by dry filters, and exhausting to the general ventilation V3.
- (b) One (1) floor assembly area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or 3.0 travel trailers per hour, with materials applied by brush, hand caulking, spray applicator, and flow applicator, applying coatings to metal and plastic substrates, and exhausting to the general ventilation V3.
- (c) One (1) shelling area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or 3.0 travel trailers per hour, with materials applied by brush and hand caulking, applying coatings to fiberglass substrate, and exhausting to the general ventilation V3.
- (d) One (1) roofing area, constructed in 1987 and modified in 2005, with a maximum throughput rate of 1.25 RV or 3.0 travel trailers per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V3.
- (e) One (1) final finish area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or three (3) travel trailers per hour, with materials applied by aerosol cans, applying coatings to carpets, and exhausting to the general ventilation V3.
- (f) One (1) touch-up operation, constructed in 1987, with a maximum throughput rate of 1.0 RV per hour, equipped with HVLP spray guns, applying coatings to miscellaneous substrates, and exhausting to the general ventilation V3.
- (g) One (1) woodworking area, constructed in 1987 and modified in 2005, with a maximum throughput rate of 6,222 pounds of wood per hour, controlled by cyclone D-553,

consisting of the following:

- (1) Two (2) table saws.
  - (2) One (1) mitre saw.
  - (3) Two (2) radial arm saws.
  - (4) One (1) pin router.
  - (5) One (1) edge sander.
  - (6) One (1) chop saw.
  - (7) Two (2) band saws.
- (h) Natural gas fired units, consisting of the following:
- (1) Nine (9) radiant heaters, identified as H-1 through H-9, each with a maximum heat input capacity of 0.125 MMBtu/hr.
  - (2) Twelve (12) radiant heaters, identified as H-10 through H-21, each with a maximum heat input capacity of 0.075 MMBtu/hr.
  - (3) One (1) themocycler air rotation unit, identified as H-22, with a maximum heat input capacity of 0.2 MMBtu/hr.
- (i) One (1) wire welder, with a maximum capacity of 5.00 pounds per hour.
- (j) One (1) stick welding station, with a maximum capacity of 0.125 pounds per hour.
- (k) One (1) oxyacetylene flame cutting station, with a maximum capacity of 27.1 pounds per hour.
- (l) Two (2) fuel oil storage tanks, identified as Tanks #1 and #2, with a maximum capacity of 1,000 gallons and 300 gallons, respectively.
- (m) One (1) mineral spirits storage drum, with a maximum capacity of 55 gallons.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

### **B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

**B.12 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

### C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

### C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.7 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

## Compliance Monitoring Requirements

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

### C.11 Response to Excursions or Exceedances

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by

excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

#### C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

#### **Record Keeping and Reporting Requirements**

##### C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (a) One (1) chassis preparation area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or 3.0 travel trailers per hour, equipped with HVLP spray guns, applying coatings to metal substrate, with emissions controlled by dry filters, and exhausting to the general ventilation V3.
- (d) One (1) roofing area, constructed in 1987 and modified in 2005, with a maximum throughput rate of 1.25 RV or 3.0 travel trailers per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V3.

(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 2-6.1]

#### D.1.1 Volatile Organic Compounds [326 IAC 8-2-9]

For the metal coating operations in the chassis preparation area and the roofing area, the Permittee shall comply with the following:

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), 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.

#### D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating operations in the chassis preparation area shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

## **Compliance Determination Requirements**

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

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Compliance with the VOC content limitation 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.

## **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

### **D.1.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the VOC content of each coating material used in the chassis preparation area and the roofing area. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with D.1.2.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (g) One (1) woodworking area, constructed in 1987 and modified in 2005, with a maximum throughput rate of 6,222 pounds of wood per hour, controlled by cyclone D-553, consisting of the following:
- (1) Two (2) table saws.
  - (2) One (1) mitre saw.
  - (3) Two (2) radial arm saws.
  - (4) One (1) pin router.
  - (5) One (1) edge sander.
  - (6) One (1) chop saw.
  - (7) Two (2) band saws.

(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 2-6.1]

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall be limited to 8.77 lbs/hr when operating at the process weight rate of 6,222 lbs/hr.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 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.2.2 Particulate Control

In order to comply with Condition D.2.1, the cyclone for particulate control shall be in operation and control emissions from the woodworking area at all times that the woodworking operations are in operation.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

#### D.2.3 Cyclone Failure Detection

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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Conquest Mini-Homes/Gulf Stream Coach, Inc.</b>
<b>Address:</b>	<b>1701 Century Drive</b>
<b>City:</b>	<b>Goshen, Indiana 46526</b>
<b>Phone #</b>	<b>(574) 773-7761</b>
<b>MSOP #:</b>	<b>039-20639-00350</b>

I hereby certify that Conquest Mini-Homes/Gulf Stream Coach, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that Conquest Mini-Homes/Gulf Stream Coach, Inc is  in compliance with the requirements of MSOP 039-20639-00350  
 not in compliance with the requirements of MSOP 039-20639-00350.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ?    Y    N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y    N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the Technical Support Document for a  
Minor Source Operating Permit**

**Source Background and Description**

Source Name:	Conquest Mini-Homes/Gulf Stream Coach, Inc.
Source Location:	1701 Century Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3716 and 3792
Operation Permit No.:	039-20639-00350
Permit Reviewer:	ERG/YC

On December 17, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Conquest Mini-Homes/Gulf Stream Coach, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a RV and travel trailer assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 10, 2006, Conquest Mini-Homes/Gulf Stream Coach, Inc. submitted comments on the proposed MSOP. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

**Comment 1:**

The Permittee stated that the correct SIC codes for this source should be 3716 (for motor homes) and 3792 (for travel trailers and campers). The Permittee requested this information be corrected in the permit and the technical support document.

**Response to Comment 1:**

The SIC code in Condition A.1 has been revised as follows. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

**A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]**

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The Permittee owns and operates a stationary RV and travel trailer assembly plant.

Authorized Individual:	President
Source Address:	1701 Century Drive, Goshen, Indiana 46526
Mailing Address:	P.O. Box 1005, Nappanee, Indiana 46550
General Source Phone:	(574) 773-7761
SIC Code:	<del>2454</del> - <b>3716 and 3792</b>

County Location: Elkhart  
Source Location Status: Nonattainment area for Ozone under 8-hour standards  
Attainment for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Emission Offset Rules  
Minor Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

**Comment 2:**

The Permittee requested the following corrections to the unit description:

- (a) The rubber roofing area in Condition A.2(d) was constructed in 2002 and modified in 2005.
- (b) The touch-up operation in Condition A.2(f) was constructed in 1987 and modified in 2002.
- (c) The woodworking area in Condition A.2(g) was constructed in 1987 and modified in 2005.
- (d) In Condition A.2(i), there is only one wire welder at this source, not three.

**Response to Comment 2:**

According to the additional information received on January 19, 2006, the Permittee stated that the applicators located in the rubber roofing area were used to apply caulk to metal roofs and were identified as the "metal roof customization area" in the original construction permit. The Permittee started to apply caulk to rubber roofs in 2002. There were no new caulk applicators purchased in 2002. Since the emission calculations in the technical support document include both the emissions from applying caulk to metal and rubber roofs, the emission unit described as the "rubber roofing area" has been revised to "roofing area" to better present the coating operations performed in this area.

Based on additional information provided by the source on January 19, 2006, the 2002 modification for the touch-up operation consisted of simply moving the operation to a new building. Since, this change is not considered a modification to the existing touch-up operation under 326 IAC 2-6.1, no changes to the description of the touch-up booth are necessary.

As a result of this comment, Condition A.2, and Sections D.1, and D.2 have been revised as follows:

**A.2 Emissions Units and Pollution Control Equipment Summary**

This stationary source is approved to operate the following emissions units and pollution control devices:

...

- (d) One (1) ~~rubber~~ roofing area, constructed in **1987 and modified in 2005** ~~2006~~, with a maximum throughput rate of 1.25 RV or 3.0 travel trailers per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V3.

...

- (g) One (1) woodworking area, constructed in 1987 and modified in **2005 2006**, with a maximum throughput rate of 6,222 pounds of wood per hour, controlled by cyclone D-553, consisting of the following:  
...
- (i) One (1) ~~Three (3)~~ wire welders, with a ~~total~~ maximum capacity of 5.00 pounds per hour.  
...

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]:**

- (a) One (1) chassis preparation area, constructed in 1987, with a maximum throughput rate of 1.25 RVs or 3.0 travel trailers per hour, equipped with HVLP spray guns, applying coatings to metal substrate, with emissions controlled by dry filters, and exhausting to the general ventilation V3.
- (d) One (1) ~~rubber~~ roofing area, constructed in **1987 and modified in 2005 2006**, with a maximum throughput rate of 1.25 RV or 3.0 travel trailers per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V3.

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

**D.1.1 Volatile Organic Compounds [326 IAC 8-2-9]**

For the metal coating operations in the chassis preparation area and the ~~rubber~~ roofing area, the Permittee shall comply with the following:

...

**D.1.4 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the VOC content of each coating material used in the chassis preparation area and the ~~rubber~~ roofing area. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

...

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]:**

- (g) One (1) woodworking area, constructed in 1987 and modified in **2005 2006**, with a maximum throughput rate of 6,222 pounds of wood per hour, controlled by cyclone D-553, consisting of the following:

...

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

**Comment 3:**

The Permittee requests that the Annual Notification requirements in the MSOP present solely the specific language stated in 326 IAC 2-6.1-5(a)(5) which requires that the permit contain:

“(5) A requirement that an authorized individual provide an annual notice to the department that the source is in operation and in compliance with the permit or registration.”

The Permittee stated that the draft MSOP includes a requirement to report noncompliance “at any time during the year” in addition to the Permittee’s compliance status. The MSOP regulations were strictly constructed to require a statement of compliance status at the time of submitting the Annual Notification, but not to include an accounting of any past issues of noncompliance which have since been resolved. The draft MSOP condition elevates the Annual Notification to the level of an Annual Compliance Certification pursuant to the Part 70 Permit requirements. The Permittee stated that this is without merit and is overreaching regulatory authority.

Conquest requests that Condition B.6(b) be revised to be consistent with the regulatory requirement by deleting the second sentence in paragraph (b) and deleting the provision for a narrative description of noncompliance on the Annual Notification form. The Permittee indicated these revisions were incorporated in the final MSOP #097-21094-00179 for Commercial Finishing Corporation which was issued on December 12, 2005.

**Response to Comment 3:**

Upon further review, IDEM, OAQ has determined to make the following changes to Condition B.6 as the result of this comment:

**B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) **An Annual notification shall be submitted by an authorized individual** to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- ~~(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~
- ~~(be) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:~~  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204-2251
- ~~(cd) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any~~

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

**Comment 4:**

The Permittee stated that the metal coating operations performed in the chassis preparation area and the roofing area are both air dried. 326 IAC 8-2-9 (d)(2) specifies a VOC limit for miscellaneous metal parts and products of "3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 90 degrees Celsius." Conquest requests that Condition D.1.1(a) be corrected to the applicable 3.5 pounds per gallon VOC limit rather than the incorrect 3.0 pounds per gallon VOC limit presented in the public noticed draft MSOP.

**Response to Comment 4:**

Since the coatings applied to the metal substances in the chassis preparation area and the roofing area are air dried, the metal coating operations in the chassis preparation area and the roofing area are subject to the VOC content limit of 3.5 lbs/gal in 326 IAC 8-2-9 (d)(2). Therefore, Condition D.1.1 has been revised as follows:

D.1.1 Volatile Organic Compounds [326 IAC 8-2-9]

For the metal coating operations in the chassis preparation area and the ~~rubber~~ roofing area, the Permittee shall comply with the following:

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three **and five-tenths (3.5 ~~3.0~~)** pounds of VOC per gallon of coating excluding water, delivered to a coating applicator **in a coating application system that is air dried.**

...

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a  
Minor Source Operating Permit

**Source Background and Description**

Source Name:	Conquest Mini-Homes/Gulf Stream Coach, Inc.
Source Location:	1701 Century Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	2451
Operation Permit No.:	039-20639-00350
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Conquest Mini-Homes/Gulf Stream Coach, Inc. relating to the operation of a RV and travel trailer assembly plant.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) chassis preparation area, constructed in 1987, with a maximum throughput rate of 1.25 RVs per hour, equipped with HVLP spray guns, applying coatings to metal substrate, with emissions controlled by dry filters, and exhausting to the general ventilation V3.
- (b) One (1) floor assembly area, constructed in 1987, with a maximum throughput rate of 1.25 RVs per hour, with materials applied by brush, hand caulking, spray applicator, and flow applicator, applying coatings to metal and plastic substrates, and exhausting to the general ventilation V3.
- (c) One (1) shelling area, constructed in 1987, with a maximum throughput rate of 1.25 RVs per hour, with materials applied by brush and hand caulking, applying coatings to fiberglass substrate, and exhausting to the general ventilation V3.
- (d) One (1) final finish area, constructed in 1987, with a maximum throughput rate of 1.25 RVs per hour, with materials applied by aerosol cans, applying coatings to carpets, and exhausting to the general ventilation V3.
- (e) One (1) touch-up operation, constructed in 1987, with a maximum throughput rate of 1.0 RV per hour, equipped with HVLP spray guns, applying coatings to miscellaneous substrates, and exhausting to the general ventilation V3.
- (f) One (1) woodworking area, constructed in 1987, with a maximum throughput rate of 700 pounds of wood per hour, controlled by cyclone D-553, consisting of the following:
  - (1) Two (2) table saws.
  - (2) One (1) mitre saw.
  - (3) Two (2) radial arm saws.
  - (4) One (1) pin router.
  - (5) One (1) edge sander.

- (6) One (1) chop saw.
- (7) Two (2) band saws.
- (g) Natural gas fired units, consisting of the following:
  - (1) Nine (9) radiant heaters, identified as H-1 through H-9, each with a maximum heat input capacity of 0.125 MMBtu/hr.
  - (2) Twelve (12) radiant heaters, identified as H-10 through H-21, each with a maximum heat input capacity of 0.075 MMBtu/hr.
  - (3) One (1) themocycler air rotation unit, identified as H-22, with a maximum heat input capacity of 0.2 MMBtu/hr.
- (h) Three (3) wire welders, with a total maximum capacity of 5.00 pounds per hour.
- (i) One (1) stick welding station, with a maximum capacity of 0.125 pounds per hour.
- (j) One (1) oxyacetylene flame cutting station, with a maximum capacity of 27.1 pounds per hour.
- (k) Two (2) fuel oil storage tanks, identified as Tanks #1 and #2, with a maximum capacity of 1,000 gallons and 300 gallons, respectively.
- (l) One (1) mineral spirits storage drum, with a maximum capacity of 55 gallons.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units or pollution control equipment at this source.

#### **New and Modified Emission Units and Pollution Control Equipment**

In an e-mail received on November 21, 2005, the Permittee requested permission to use the existing units equipment to assemble travel trailers, instead of RVs, for a short term project (about 3 to 4 months). The maximum production rate with the existing equipment is three (3) travel trailers per hour. In order to assemble travel trailers, the Permittee will construct or modify the following emissions units:

- (a) One (1) rubber roofing area, constructed in 2006, with a maximum throughput rate of 1.25 RV or 3.0 travel trailers per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V3.
- (b) One (1) woodworking area, constructed in 1987 and modified in 2006, with a maximum throughput rate of 6,222 pounds of wood per hour, controlled by the existing cyclone D-553.

#### **Existing Approvals**

The source has been operating under the previous approval CP# 039-4843-00350, issued February 19, 1996.

All conditions from previous approvals were incorporated into this permit.

### Enforcement Issue

- (a) IDEM is aware that the source did not apply for a Minor Source Operating Permit prior December 25, 1999 [i.e., within (12) months after the effective date of 326 IAC 2-6.1].
- (b) IDEM is reviewing this matter and will take appropriate action.

### Recommendation

The staff recommends to the Commissioner that the operation 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 31, 2005. Additional information was received on August 1, 2005, August 19, 2005, and November 21, 2005.

### Emission Calculations

The Permittee stated that they cannot assemble RVs and travel trailers at the same time and the RV assembly operation is the worst case scenario. Therefore, the potential to emit calculations are based on the operating scenario in which 1.25 RVs are assembled per hour. See Appendix A of this document for detailed emission calculations (pages 1 through 7).

### Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/year)
PM	76.4
PM10	76.4
SO <sub>2</sub>	0.01
VOC	78.5
CO	0.82
NO <sub>x</sub>	0.97

HAPs	Potential to Emit (tons/year)
MEK	6.38
Xylene	0.09
Toluene	0.08
MIBK	0.01
Ethyl Benzene	0.01
Total	6.57

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, PM and PM10 is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (d) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment or Unclassifiable
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as Nonattainment for 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	76.4
PM10	76.4
SO <sub>2</sub>	0.01
VOC	78.5
CO	0.82
NO <sub>x</sub>	0.97
Total HAP	6.57

- (a) This existing source is not an Emission Offset major stationary source because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

- (b) This existing source is not a PSD major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) These emissions were based on the potential to emit calculations for this source (See Appendix A).

#### **Part 70 Permit Determination**

##### 326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The source does not perform surface coating operations of metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in this permit.
- (c) This source does not apply the surface coating to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not included in this permit.
- (d) The storage tanks at this source have capacities less than 75 cubic meters (19,813 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb) are not included in this permit.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.
- (f) This existing source is not a HAP major source. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) are not included in this permit.
- (g) This existing source is not a HAP major source. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (40 CFR 63.4480 - 63.4581, Subpart PPPP) are not included in this permit.

#### **State Rule Applicability – Entire Source**

##### 326 IAC 2-3 (Emission Offset)

This source was constructed in 1987 and will be modified in 2006. This source is located in Elkhart County, which was designated as a nonattainment area for the 8-hour Ozone standard in June

2004. The potential to emit VOC and NO<sub>x</sub> of this source will remain less than 100 tons/year after the modification in 2006. Therefore, this source is a minor source under Emission Offset.

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

This source was constructed in 1987 and will be modified in 2006. This existing source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(gg) and the potential to emit of PM<sub>10</sub>, SO<sub>2</sub>, and CO will remain less than 250 tons per year after the modification in 2006. Therefore, this existing source is a PSD minor source.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed in 1987 and will be modified in 2006. The modification in 2006 will not have a potential to emit HAPs greater than 10 tons per year for a single HAP or greater than 25 tons per year for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is not required to operate under the Part 70 Permit program. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

<b>State Rule Applicability - Coating Operations</b>
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326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The coating operations in the chassis preparation area were constructed after November 1, 1980, have potential VOC emissions greater than 25 tons/yr, and apply coatings to metal substrates. The metal coating operation in the rubber roofing area will be constructed after July 1, 1990 and will have actual VOC emissions greater than 15 pounds per day. Therefore, the VOC content of the coatings applied in the chassis preparation area and the rubber roofing area shall be limited as follows:

- (a) Three (3.0) pounds VOC per gallon of coating, excluding water, delivered to the applicators.
- (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 completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

According to the MSDS provided by the Permittee, the VOC content of the coatings used in the chassis preparation area is in compliance with the VOC content limit in 326 IAC 8-2-9.

The coating operations in the floor assembly area and touch-up paint area also apply coatings to metal substrate. However, the potential VOC emissions from the metal coating operations at these areas are less than 25 tons/yr. The coating operations in the shelling area and the final finish area do not apply coating to metal substrate. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to the surface coating operations at the floor assembly, shelling, final finish, and touch-up paint areas.

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

The surface coating operations in the floor assembly area and the rubber roofing area apply adhesives to wood substrates. However, the adhesives used are water based and do not contain any VOC. Therefore, the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable to these coating operations.

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

The coating operations in the chassis preparation area are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Therefore, the coating operations in the chassis preparation area are not subject to the requirements of 326 IAC 8-1-6 (BACT). The potential VOC emissions from each of the surface coating operations in the floor assembly area, the shelling area, the rubber roofing area, the final finish area, and the touch-up paint area are less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

Pursuant to 326 IAC 6-3-1(b), surface coating operations using flow coating, brush coating, and aerosol coating products are exempt from the requirements of 326 IAC 6-3. In addition, the spray coating operations in the floor assembly area and touch-up paint area do not use more than 5 gallons of coating per day. Therefore, only the spray coating operations in the chassis preparation area are subject the requirements of 326 IAC 6-3.

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the spray coating operations in the chassis preparation area shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

<b>State Rule Applicability – Woodworking Operation</b>
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**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

The allowable particulate emissions from the woodworking operation shall be limited to 8.77 lbs/hr when operating at the process weight rate of 6,222 lbs/hr.

The pounds per hour limitation was calculated with the following equation:

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

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

As shown in Appendix A, the potential to emit particulate from this woodworking operation after control is less than the emission limit above. The use of cyclone D-533 ensures compliance with this limit.

**State Rule Applicability – Natural Gas Fired Heating Units**

There are no specifically applicable requirements for these units.

**State Rule Applicability – Welding and Cutting Operations**

326 IAC 6-3 (Manufacturing Processes)

The welding operations at this source consume less than 625 pounds of rod or wire per day. Therefore, the welding equipment at this source is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(9). The cutting station at this source cuts less than 3,400 inches per hour of one inch thickness stock. Therefore, the cutting station at this source is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(10).

**State Rule Applicability – Storage Tanks**

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to the storage tanks at this source.

326 IAC 12 (NSPS Requirements)

The storage tanks at this source have capacities less than 40 cubic meters (10,567 gallons). Therefore, these solvent storage tanks are not subject to the requirements of New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb as of date July 1, 2002).

**Conclusion**

The operation of this RV and travel trailer assembly plant shall be subject to the conditions of the Minor Source Operating Permit 039-20639-00350.

**Appendix A: Emission Calculations  
VOC and PM/PM10 Emissions  
From the Surface Coating Operations**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.  
Address : 1701 Century Dr., Goshen, IN 46526  
Permit: 039-20639-00350  
Reviewer: ERG/YC  
Date: November 28, 2005**

Material	Substrate	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 before Control* (lbs/hr)	**PTE of PM/PM10 before Control* (tons/yr)	Application Methods	Transfer Efficiency**
<b>Chassis Prep</b>															
16-410	Metal	8.40	67.0%	52.0%	15.2%	1.25	0.250	1.27	0.40	9.54	1.74	0.30	1.33	Spray	65%
Transcoat 101	Metal	9.50	55.0%	40.0%	15.0%	1.25	2.750	1.43	4.90	118	21.5	5.14	22.5	Spray	65%
Grey Foam Seal Resin	Metal	9.83	24.2%	0.30%	3.10%	1.25	1.100	0.30	0.42	10.1	1.84	1.02	4.49	Spray	90%
Foam Seal Iso	Metal	10.3	0.00%	0.00%	0.00%	1.25	1.100	0.00	0.00	0.00	0.00	1.42	6.22	Spray	90%
<b>Floors</b>															
Pipe Dope	Metal	11.7	64.0%	41.0%	23.0%	1.25	0.003	2.70	0.01	0.20	0.04	0.00	0.00	Brush	100%
ABS Yellow Cement	Plastic	7.08	75.0%	0.00%	75.0%	1.25	0.100	5.31	0.66	15.9	2.91	0.00	0.00	Brush	100%
ABS Black Cement	Plastic	6.66	75.0%	0.00%	75.0%	1.25	0.100	5.00	0.62	15.0	2.73	0.00	0.00	Brush	100%
ABS Cleaner	Plastic	6.75	100%	0.00%	100%	1.25	0.025	6.75	0.21	5.06	0.92	0.00	0.00	Brush	100%
502 Silicone	Metal/Wood/Glass	8.59	0.00%	0.00%	0.00%	1.25	3.000	0.00	0.00	0.00	0.00	0.00	0.00	Extruded	100%
Enerfoam 43	Metal/Wood/Glass	10.0	0.00%	0.00%	0.00%	1.25	0.250	0.00	0.00	0.00	0.00	0.31	1.37	Spray	90%
Hot Melt 5430	Felt, Metal	7.74	0.00%	0.00%	0.00%	1.25	0.250	0.00	0.00	0.00	0.00	0.00	0.00	Flow	100%
<b>Shelling</b>															
SIA 485B	Fiberglass	10.8	55.0%	55.0%	0.05%	1.25	0.160	0.01	0.00	0.03	0.00	0.00	0.00	Rolled	100%
DC 12718 Sealant	Fiberglass	9.92	32.5%	0.50%	32.0%	1.25	0.900	3.17	3.57	85.7	15.6	0.00	0.00	Extruded	100%
<b>Rubber Roofing</b>															
8011 Adhesive	wood/rubber	8.34	42.0%	42.0%	0.00%	1.25	0.750	0.00	0.00	0.00	0.00	0.00	0.00	Brush	100%
1021 Self Leveling	Metal	11.4	34.0%	12.0%	22.0%	1.25	1.000	2.50	3.12	74.9	13.7	0.00	0.00	Extruded	100%
<b>Final Finish</b>															
Spot Beater	Carpet	8.13	89.0%	64.0%	25.0%	1.25	0.104	2.03	0.26	6.34	1.16	0.01	0.03	Aeresol Cans	95%
Insta Buff	All	8.04	74.0%	56.0%	18.0%	1.25	0.006	1.45	0.01	0.26	0.05	0.00	0.00	Aeresol Cans	95%
<b>Total</b>											<b>62.2</b>		<b>36.0</b>		

\* Assume all the PM emissions are PM10 emissions.

\*\* The transfer efficiency information is provided by the manufacturer.

#### METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency)

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emissions  
From the Surface Coating Operations**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.**

**Address : 1701 Century Dr., Goshen, IN 46526**

**Permit: 039-20639-00350**

**Reviewer: ERG/YC**

**Date: November 28, 2005**

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % MEK	PTE of MEK (tons/yr)
<b>Chassis Prep</b>					
16-410	8.40	1.25	0.250	0%	0.00
Transcoat 101	9.50	1.25	2.750	0%	0.00
Grey Foam Seal Resin	9.83	1.25	1.100	0%	0.00
Foam Seal Iso	10.3	1.25	1.100	0%	0.00
<b>Floors</b>					
Pipe Dope	11.7	1.25	0.003	0%	0.00
ABS Yellow Cement	7.08	1.25	0.100	75%	2.91
ABS Black Cement	6.66	1.25	0.100	68%	2.48
ABS Cleaner	6.75	1.25	0.025	100%	0.92
502 Silicone	8.59	1.25	3.000	0%	0.00
Enerfoam 43	10.0	1.25	0.250	0%	0.00
Hot Melt 5430	7.74	1.25	0.250	0%	0.00
<b>Shelling</b>					
SIA 485B	10.80	1.25	0.160	0%	0.00
DC 12718 Sealant	9.92	1.25	0.900	0%	0.00
<b>Rubber Roofing</b>					
8011 Adhesive	8.34	1.25	0.750	0%	0.00
1021 Self Leveling	11.4	1.25	1.000	0%	0.00
<b>Final Finish</b>					
Spot Beater	8.13	1.25	0.104	0%	0.00
Insta Buff	8.04	1.25	0.006	0%	0.00
<b>Total</b>					<b>6.31</b>

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
VOC and PM/PM10 Emissions  
From Touch-Up Paint Area**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.**

**Address : 1701 Century Dr., Goshen, IN 46526**

**Permit: 039-20639-00350**

**Reviewer: ERG/YC**

**Date: November 28, 2005**

Material	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 before Control* (lbs/hr)	PTE of PM/PM10 before Control* (tons/yr)	Transfer Efficiency**
DZ-3 Primer	10.0	61.0%	0.00%	61.0%	1.00	0.0023	6.10	0.01	0.34	0.06	0.00	0.01	65%
100-5 Lacquer Thinner	7.03	100%	0.00%	100%	1.00	0.0023	7.03	0.02	0.39	0.07	0.00	0.00	65%
G-1 ChromaOne Paint	10.2	40.3%	0.00%	40.3%	1.00	0.0030	4.11	0.01	0.30	0.05	0.01	0.03	65%
7005S Activator	8.70	34.7%	0.00%	34.7%	1.00	0.0009	3.02	0.00	0.07	0.01	0.00	0.01	65%
7075S Reducer	7.10	100%	0.00%	100%	1.00	0.0009	7.10	0.01	0.15	0.03	0.00	0.00	65%
7600S Clear	7.75	64.4%	0.00%	64.4%	1.00	0.0030	4.99	0.01	0.36	0.07	0.00	0.01	65%
7675S Activator	8.31	62.5%	0.00%	62.5%	1.00	0.0008	5.19	0.00	0.10	0.02	0.00	0.00	65%
7601S Blender	7.17	96.3%	0.00%	96.3%	1.00	0.0022	6.90	0.02	0.36	0.07	0.00	0.00	65%
<b>Total</b>										<b>0.38</b>		<b>0.07</b>	

\* Assume all the PM emissions are PM10 emissions.

\*\* HVLP application method is used for the operations in this area. The transfer efficiency is from an HVLP document prepared by BINKS.

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency)

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \*(1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emissions  
From Touch-Up Paint Area**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.  
Address : 1701 Century Dr., Goshen, IN 46526  
Permit: 039-20639-00350  
Reviewer: ERG/YC  
Date: November 28, 2005**

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % of MEK	PTE of MEK (tons/yr)	Weight % of MIBK	PTE of MIBK (tons/yr)	Weight % of Toluene	PTE of Toluene (tons/yr)	Weight % of Xylene	PTE of Xylene (tons/yr)	Weight % of Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)
DZ-3 Primer	10.0	1.00	0.0023	10%	0.01	0.00%	0.00	25.0%	0.03	10.0%	0.01	0.00%	0.00
100-5 Lacquer Thinner	7.03	1.00	0.0023	27%	0.02	1.00%	7.08E-04	19.0%	0.01	27.0%	0.02	5.60%	3.97E-03
G-1 ChromaOne Paint	10.2	1.00	0.0030	0%	0.00	0.00%	0.00	0.0%	0.00	16.0%	0.02	3.00%	4.02E-03
7005S Activator	8.70	1.00	0.0009	0%	0.00	0.00%	0.00	0.0%	0.00	0.0%	0.00	0.00%	0.00
7075S Reducer	7.10	1.00	0.0009	30%	0.01	0.00%	0.00	0.0%	0.00	0.0%	0.00	0.00%	0.00
7600S Clear	7.75	1.00	0.0030	12%	0.01	7.00%	7.13E-03	18.0%	0.02	25.0%	0.03	0.00%	0.00
7675S Activator	8.31	1.00	0.0008	0%	0.00	0.00%	0.00	0.0%	0.00	0.0%	0.00	0.00%	0.00
7601S Blender	7.17	1.00	0.0022	28%	0.02	0.00%	0.00	28.0%	0.02	16.0%	0.01	0.00%	0.00
<b>Total</b>					<b>0.07</b>		<b>0.01</b>		<b>0.08</b>		<b>0.09</b>		<b>0.01</b>

**Total HAPs = 0.25 tons/yr**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From the Woodworking Operation**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.  
Address : 1701 Century Dr., Goshen, IN 46526  
Permit: 039-20639-00350  
Reviewer: ERG/YC  
Date: November 28, 2005**

**Process Description:**

PM Control Equipment: Cyclone  
Grain Loading: 0.013 grains/dscf  
Air Flow Rate: 4,050 acfm  
Control Efficiency: 95.0%

**1. Potential to Emit After Control:**

Assume all the PM emissions are equal to PM10 emissions.

<b>Hourly PM/PM10 Emissions</b>	= 0.013 (gr/dscf) x 4,050 (cf/min) x 60 (min/hr) x 1/7000 (lb/gr) =	<b>0.45 lbs/hr</b>
<b>Annual PM/PM10 emissions</b>	= 0.45 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	<b>1.98 tons/yr</b>

**2. Potential to Emit Before Control:**

<b>PTE of PM/PM10 Before Control</b>	= 1.98 tons/yr / (1-95% Control Efficiency) =	<b>39.5 tons/yr</b>
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**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Natural Gas Combustion Units**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.  
Address : 1701 Century Dr., Goshen, IN 46526  
Permit: 039-20639-00350  
Reviewer: ERG/YC  
Date: November 28, 2005**

Heat Input Capacity  
MMBtu/hr  
**2.23** (22 units combined)

Potential Throughput  
MMCF/yr  
19.5

	Pollutant					
Emission Factor in lbs/MMCF	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.07</b>	<b>0.07</b>	<b>5.8E-03</b>	<b>0.97</b>	<b>0.05</b>	<b>0.82</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMCF.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM and HAP Emissions  
From Welding and Cutting Operations**

**Company Name: Conquest Mini-Homes/Gulf Stream Coach, Inc.  
Address : 1701 Century Dr., Goshen, IN 46526  
Permit: 039-20639-00350  
Reviewer: ERG/YC  
Date: November 28, 2005**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)			
			PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr				
WELDING														
Metal Inert Gas (MIG)(carbon steel)	3	1.70				0.0241	0.000034		0.00001	0.123	1.73E-04	0	5.10E-05	2.24E-04
Stick (E7018 electrode)	1	0.125				0.0211	0.0009			0.003	1.13E-04	0	0	1.13E-04

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)						
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr							
FLAME CUTTING																		
Oxyacetylene	1	0.38	12							0.1622	0.0005	0.0001	0.0003	0.044	1.35E-04	2.70E-05	8.10E-05	2.43E-04

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	0.17	4.21E-04	2.70E-05	1.32E-04	5.80E-04
Potential Emissions (lbs/day)	4.06	1.01E-02	6.48E-04	3.17E-03	1.39E-02
<b>Potential Emissions (tons/year)</b>	<b>0.74</b>	<b>1.84E-03</b>	<b>1.18E-04</b>	<b>5.78E-04</b>	<b>2.54E-03</b>

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

**METHODOLOGY**

Welding emissions (lb/hr) = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)  
 Cutting emissions (lb/hr) = (# of stations) x (max. metal thickness, in.) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 1" thick)  
 Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day  
 Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.