INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: August 30, 2005

RE: Monaco Coach / 039-20873-00017

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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

Enclosures
FNTV-PMOD.doc 1/10/05

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August 30, 2005

Mr. Kurt W. Anderson
Monaco Coach Corporation
606 Nelson's Parkway, P.O. Box 465
Wakarusa, Indiana 46573

Re: 039-20873-00017
First Significant Permit Modification to
Part 70 Permit No.: T039-7559-00017

Dear Mr. Anderson:

Monaco Coach Corporation was issued a permit on June 21, 2004 for a multiple-plant complex that assembles and paints high quality luxury motor homes that vary in floor plan and length. A letter requesting changes to this permit was received on August 31, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

This modification consists of adding the following units to existing partial paint line A at plant 2 (final paint plant) and plant 36 (fiberglass fabrication plant):

Plant 2: Partial Paint Line A

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

Plant 36: Fiberglass Fabrication Plant

(7) One (1) closed molding operation, an alternative method to open molding operation, used when closed molding operation is viable.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

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

Attachments

ERG/SD

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

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Monaco Coach Corporation
606 Nelson's Parkway
Wakarusa, 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. **This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.**

Operation Permit No.: T039-7559-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2004 Expiration Date: June 21, 2009
First Significant Permit Modification No.: 039-20873-00017, issued April 12, 2005	
Second Significant Permit Modification No.: 039-20873-00017	Pages Affected: 9-10, 12, 25, 38, 42-43, 56-61, 64-73, 87
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: August 30, 2005

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Certification
Emergency Occurrence Report
Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary source that is a multiple-plant complex that assembles and paints high-quality, luxury motor homes that vary in floor plan and length.

Responsible Official:	Chief Administrative Officer/ Senior Vice President
Source Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Mailing Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Source Phone Number:	(260) 862-7347
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard; Attainment for ozone under the 1-hour standard and for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]
Pursuant to CP 039-8662-00017, issued January 9, 1998, Monaco Coach Corporation's Nelson's Parkway Complex consists of the following plants:

(a) Plant 1 (formerly Plant 30): Motorized recreational vehicle assembly

(b) Plant 2: Final Paint

(c) Plant 20: Welding and adhesive application

(d) Plant 22: Metal shop

(e) Plants 23 & 24: Normal maintenance operations

(f) Plant 25: Warehouse and Tile Floor Set

(g) Plant 26: White glove inspection (formerly called Undercoating)

(h) Plant 27: Storage

(i) Plant 28: Formtec/Thermoforming

(j) Plant 29: Towable service center (formerly called Molds research & development)

(k) Plant 31: Sewing, warehouse, white glove and cap assembly (formerly a paint area)

(l) Plant 32: R&D shop and warehouse

(m) Plant 33: Compressor building
(n) Plant 34: Fire pump

(o) Plant 36: Fiberglass fabrication

(p) Plant 37: Fiberglass molding

(q) Plant 38: R&D machine shop and print shop

(r) Plant 39: Training Center and Overflow Service Center

(s) Plant 46: Dispatch

Since these twenty (20) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

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:

(a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:

(1) One (1) dip tank coating operation, identified as SV1-5, constructed in 1991 and reconstructed in 1997, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-5;

(2) Two (2) surface coating booths for chassis painting, identified as SV1-3 and SV1-4, each constructed in 1991 and reconstructed in 1997, each with a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting to stacks SV1-3 and SV1-4, respectively;

(3) One (1) woodworking millroom, identified as D1-01, constructed in 1997, a maximum capacity of 2000 pounds of wood per hour, with emissions controlled by a baghouse, and exhausting to stack DV1-01;

(4) One (1) sidewall adhesive application process, identified as SV1-6, constructed in 1997, a maximum capacity of 1.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-6;

(5) Three (3) manual assembly lines, using caulks, sealants, cleaners, and various hand tools, identified as D1-04, each line constructed in 1997, a total maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to general ventilation vent GV1-01;

(6) Eighty-four (84) welding stations, constructed in 1998, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, exhausting to general ventilation vent GV1-02;

(b) Plant 2: A final paint plant, consisting of:

(1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1)

clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 1,400 full paint units (motor homes) per year or 2,500 partial paint units (motor homes) per year, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively and consisting of:

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

(2) One Full Paint Line B, constructed in 1997 and reconstructed in 2003, consisting of:

(A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-20, SV2-21, and SV2-22, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-20, SV2-21, and SV-22, respectively;

(B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-23, SV2-24, SV2-25, and SV2-26, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-23A, SV2-23B, SV2-24A, SV2-24B, SV2-25A, SV2-25B, SV2-26A, and SV2-26B, respectively;

(3) One Full Paint Line C, constructed in 1997 and reconstructed in 2003, consisting of:

(A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-13, SV2-14, and SV2-15, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-13, SV2-14, and SV2-15 respectively;

(B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-16, SV2-17, SV2-18, and SV2-19, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-16A, SV2-16B, SV2-17A, SV2-17B, SV2-18A, SV2-18B, SV2-19A, and SV2-19B, respectively;

(4) One Full Paint Line D, constructed in 2003, consisting of:

(A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-7 and SV2-8 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-7 and SV2-8, respectively;

(B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-9, SV2-10, SV2-11, and SV2-12, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-9A, SV2-9B, SV2-10A, SV2-10B, SV2-11A, SV2-11B, SV2-12A, and SV2-12B, respectively;

(5) One Full Paint Line E, constructed in 2003, consisting of:

(A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-1 and SV2-2 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-1 and SV2-2, respectively;

(B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-3, SV2-4, SV2-5, and SV2-6, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-3A, SV2-3B, SV2-4A, SV2-4B, SV2-5A, SV2-5B, SV2-6A, and SV2-6B, respectively;

(6) One (1) repair area, consisting of:

(A) One (1) paint repair booth, identified as SV2-30, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-30;

(B) One (1) paint repair booth, identified as SV2-31, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-31;

(C) One (1) paint repair booth, identified as SV2-32, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-32;

(D) One (1) paint repair booth, identified as SV2-33, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-33; and

(E) One (1) paint repair booth, identified as SV2-34, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray

equipment, with emissions controlled by dry filters, exhausting to stack SV2-34.

(7) One (1) undercoating operation, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stacks SV2-UC1 and SV2-UC2; and

(c) Plant 20: A welding and adhesive application plant, consisting of:

(1) One (1) adhesive application process, identified as EU-20A, constructed in the 1960s, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to general ventilation stacks GV20-6 through GV20-10; and

(2) One (1) sidewall welding operation, identified as EU-20B, constructed prior to 1981, consisting of twenty-four (24) welding stations, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, and exhausting to general ventilation stacks GV20-2 through GV20-5.

(d) Plant 22: A metal shop, consisting of:
One (1) dash component production area which includes one (1) surface coating spray room, identified as GV22-3/GV22-4, constructed in the 1970s, a maximum capacity of 3.5 units per hour, using air-atomized spray application, with emissions controlled by dry filters, exhausting to stacks GV22-3 and GV22-4.

(e) Plant 28: A Formtec (Thermoforming) plant, consisting of:

(1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and

(2) One (1) tank cover chemical welding operation, identified as SV28-01, constructed prior to 1985, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to stack SV28-01.

(f) Plant 36: A fiberglass fabrication plant, consisting of:

(1) Two (2) gelcoat booths, identified as GC36-1 and GC36-2, each constructed in 1986, each with a maximum capacity of 3.5 units per hour, gel applied using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV36-7;

(2) One (1) barrier coat spray station, identified as BC36-1, constructed in 2001, a maximum capacity of 4.0 units per hour, unfilled production resins applied using non-atomized spray application, with emissions controlled by dry filters and exhausting to stack SV36-14;

(3) Three (3) fiberglass chop booths, identified as SV36-1&2, SV36-3&4, and SV36-5&6, each constructed prior to 1985, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-1, through SV36-6;

(4) Five (5) grinding stations, identified as GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5, each constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, and each with a 100% recirculated air exhaust air steam;

(5) One (1) gelcoat booth, identified as GC36-3, constructed in 1994, a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stack SV36-12 and SV36-13;

(6) Two (2) fiberglass chop booths, identified as CS36-4 and CS36-5, constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-8 and SV36-9;

(7) One (1) closed molding operation, an alternative method to open molding operation, used when closed molding operation is viable.

(g) Plant 37: A fiberglass molding plant, consisting of:

(1) One (1) fiberglass fabricating area, identified as CS37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

(2) One (1) gel coat booth, identified as GC37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

(h) Plant 39: Training Center and Overflow Service Center:
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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

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

(a) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly plant, consisting of:

(1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21]

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and 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:

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

(b) Plant 2: Final Paint
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total

maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1]

(2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]

(3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]

(c) Plant 22: A metal shop
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:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour, with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

(d) Plant 26: A White glove inspection area
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using manually-applied cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(e) Plant 28: Formtec/Thermoforming
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

(f) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Thirteen (13) service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 and expanded in 2000, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(g) Plant 31: Sewing, warehouse, white glove and cap assembly
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]

(2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]

(3) White glove inspections using some cleaners, caulks and touch-up paint; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP] and

(4) One (1) natural gas-fired boiler with a heat input capacity of 12.0 MMBtu/hr. [326 IAC 6-2-3]

(h) Plant 32: R&D (Research & Development) shop and warehouse
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) one (1) R&D CNC router [326 IAC 6-3-2]

(2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21][326 IAC 2-2][40 CFR 52 Subpart P] [326 IAC 6-3-2(d)] [326 IAC 20-25]

(i) Plant 38: R&D machine shop and print shop
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Three (3) printing presses (moved from Plant 45) which use low-VOC soy-based inks. [40 CFR 52.21] [326 IAC 2-2]

(j) Plant 25: Warehouse and Tile Floor Set:
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report 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) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(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:

(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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs 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 PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) 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 the unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
and
Telephone Number:219-245-4870 (Northern Regional Office)
Facsimile Number: 219-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC13-17-3-2] [IC 13-30-3-1]

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 Part 70 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 any records that must be kept under the conditions of this permit;

(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 any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (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][326 IAC 1-1-6]
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

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2(c)]

(a) Pursuant to [40 CFR 52 Subpart P], particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) 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. This condition is not federally enforceable.

C.2 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 29, 1999.

(b) Upon direct notification by IDEM, OAQ,, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ. The notification shall also include the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6**.** This statement must be received in accorance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6~~.~~ The emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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 within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and 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

(c) 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.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.23 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1

(a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:

(1) One (1) dip tank coating operation, identified as SV1-5, constructed in 1991 and reconstructed in 1997, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-5;

(2) Two (2) surface coating booths for chassis painting, identified as SV1-3 and SV1-4, each constructed in 1991 and reconstructed in 1997, each with a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting to stacks SV1-3 and SV1-4, respectively;

(3) One (1) woodworking millroom, identified as D1-01, constructed in 1997, a maximum capacity of 2000 pounds of wood per hour, with emissions controlled by a baghouse, and exhausting to stack DV1-01;

(4) One (1) sidewall adhesive application process, identified as SV1-6, constructed in 1997, a maximum capacity of 1.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-6;

(5) Three (3) manual assembly lines, using caulks, sealants, cleaners, and various hand tools, identified as D1-04, each line constructed in 1997, a total maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to general ventilation vent GV1-01;

(6) Eighty-four (84) welding stations, constructed in 1998, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, exhausting to general ventilation vent GV1-02;

(specifically regulated insignificant activities:)

(a) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly

(1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and 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:

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

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

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

D.1.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1, and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from surface coating booths SV1-3 and SV1-4 shall be limited by the following:

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

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

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

(a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour.

(b) Each of the Plant 1 manual assembly lines shall not exceed 2.03 pounds per hour based on a maximum process weight rate of 0.35 tons per hour each.

(c) The welding operations shall not exceed, in aggregate, the allowable particulate emission rate of 1.02 pounds per hour based on a maximum process weight rate of 252 pounds per hour.

(d) The insignificant metal working operation (D1-02) shall not exceed 1.02 pounds per hour based on a maximum process weight rate of 250 pounds per hour.

These pound per hour limitations were calculated with the following equation:

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

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

D.1.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by surface coating booths SV1-3 and SV1-4, dip tank coating operation SV1-5, and sidewall adhesive application process SV1-6, shall not exceed 3.5 pounds of VOCs per gallon of coating as delivered to the applicator, excluding water, for forced warm air dried coatings.

D.1.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of booths SV1-3 and SV1-4 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from surface coating booths SV1-3 and SV1-4 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 Particulate Control

In order to comply with Condition D.1.3, the baghouses shall be in operation and control particulate emissions from facilities D1-01 and D1-02 at all times the respective facilities are in operation.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from D1-01 when exhausting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) 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.

(b) 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).

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.1.1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

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

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

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

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain records of the inspections.

(d) To document compliance with Condition D.1.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) Plant 2: A final paint plant, consisting of:

(1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 1,400 full paint units (motor homes) per year or 2,500 partial paint units (motor homes) per year, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively and consisting of:

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

(2) One Full Paint Line B, constructed in 1997 and reconstructed in 2003, consisting of:

(A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-20, SV2-21, and SV2-22, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-20, SV2-21, and SV-22, respectively;

(B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-23, SV2-24, SV2-25, and SV2-26, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-23A, SV2-23B, SV2-24A, SV2-24B, SV2-25A, SV2-25B, SV2-26A, and SV2-26B, respectively;

(3) One Full Paint Line C, constructed in 1997 and reconstructed in 2003, consisting of:

(A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-13, SV2-14, and SV2-15, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-13, SV2-14, and SV2-15 respectively;

(B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-16, SV2-17, SV2-18, and SV2-19, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-16A, SV2-16B, SV2-17A, SV2-17B, SV2-18A, SV2-18B, SV2-19A, and SV2-19B, respectively;

(The information describing the process contained in this facility description box is descriptive

information and does not constitute enforceable conditions.)

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

(4) One Full Paint Line D, constructed in 2003, consisting of:

(A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-7 and SV2-8 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-7 and SV2-8, respectively;

(B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-9, SV2-10, SV2-11, and SV2-12, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-9A, SV2-9B, SV2-10A, SV2-10B, SV2-11A, SV2-11B, SV2-12A, and SV2-12B, respectively;

(5) One Full Paint Line E, constructed in 2003, consisting of:

(A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-1 and SV2-2 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-1 and SV2-2, respectively;

(B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-3, SV2-4, SV2-5, and SV2-6, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-3A, SV2-3B, SV2-4A, SV2-4B, SV2-5A, SV2-5B, SV2-6A, and SV2-6B, respectively;

(6) One (1) repair area, consisting of:

(A) One (1) paint repair booth, identified as SV2-30, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-30;

(B) One (1) paint repair booth, identified as SV2-31, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-31;

(C) One (1) paint repair booth, identified as SV2-32, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-32;

(D) One (1) paint repair booth, identified as SV2-33, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-33; and

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

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

(E) One (1) paint repair booth, identified as SV2-34, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-34.

(7) One (1) undercoating operation, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stacks SV2-UC1 and SV2-UC2; and

(specifically regulated insignificant activities:)

(b) Plant 2: Final Paint
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]

(2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2][40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

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

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

D.2.1 Best Available Control Technology (BACT) and Maximum Control Technology (MACT) [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1] [326 IAC 8-1-6]

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 326 IAC 2-4.1, 40 CFR 52.21 and 326 IAC 2-2:

(a) All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:

(1) Lacquer thinners and preparation cleaners and solvents used on motor home exteriors will be hand-wiped and contain a maximum 6.5 pounds VOC per gallon of coating as applied.

(2) Except as provided in (6) and (8) below, primers will be applied using high volume-low pressure (HVLP) spray equipment, or the equivalent, and contain a maximum of 3.5 pounds VOC per gallon of coating as applied.

(3) Except as provided in (6) and (8) below, base coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 6.5 pounds VOC per gallon of coating as applied.

(4) Except as provided in (6) and (8) below, clear coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.

(5) Except as provided in (6) and (8) below, sealers will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.

(6) As an alternative to complying with the individual VOC content limitations for base coats and clear coats, compliance may be determined by averaging the emissions from base coat and clear coat operations across affected lines. The average VOC content for the base coat/clear coat system shall be limited to less than or equal to 4.5 pounds VOC per gallon of coating as applied. This limitation is based on a ratio of two parts clear coat to one part base coat. Compliance will be demonstrated monthly based on the actual VOC content as applied of each coating and actual usage of base coats and clear coats during the month.

(7) Good housekeeping practices will be employed to minimize leaks, spills, and evaporative losses. These include: sealing lids on all containers not in use or in storage, the purging of guns and lines into approved containers, maintaining an organized spill response and clean-up operation, performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks, the use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling, and using aqueous, exempt solvents or citric cleaners where effective and practical.

(8) All coating materials, including primers, base coats, and clear coats, used in the repair booths will be applied with air-atomized spray equipment, or the equivalent.

(9) When necessary, motor home exteriors will be hand-wiped with cleaning solvent prior to painting.

(10) Collected solvents will be recycled on-site and/or off-site to recover reusable solvents and minimize waste.

(11) Motor homes will be undercoated with a waterborne-low VOC coating.

(b) The surface coating operations in Partial Paint Line A and Full Paint Lines B through E shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements and the VOC emissions from insignificant natural gas combustion is equivalent to VOC emissions (from Partial Paint Line A and Full Paint Lines B through E) of less than or equal to 540.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements will satisfy the requirements of 326 IAC 2-4.1 (MACT), 40 CFR 52.21, and 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.3 Volatile Organic Compounds [326 IAC 8-2-9]

When coating metal parts, any change or modification which may increase the maximum capacity of any paint line (partial paint line A and full paint lines B through E) to greater than 35 vehicles (motor homes) per day must be approved by the OAQ before any such change may occur.

D.2.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.1 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, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.2.3, the Permittee shall maintain daily records of the number of vehicles painted on each paint line in that day.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(d) To document compliance with Condition D.2.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 20

(c) Plant 20: Welding and adhesive application plant, consisting of:

(1) One (1) adhesive application process, identified as EU-20A, constructed in the 1960s, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to general ventilation stacks GV20-6 through GV20-10; and

(2) One (1) sidewall welding operation, identified as EU-20B, constructed prior to 1981, consisting of twenty-four (24) welding stations, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, and exhausting to general ventilation stacks GV20-2 through GV20-5.

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

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

D.3.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]
Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Particulate Matter (PM) [40 CFR 52 Subpart P]
Pursuant to CP 039-7335-00017, issued July 24, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the sidewall welding operation (EU-20B) shall not exceed 0.12 pounds per hour when operating at a maximum process weight rate of 3.0 pounds per hour.

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

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

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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
Compliance with the VOC usage limitation contained in Condition D.3.1 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, 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 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 22

(d) Plant 22: A metal shop, consisting of:
One (1) dash component production area which includes one (1) surface coating spray room, identified as GV22-3/GV22-4, constructed in the 1970s, a maximum capacity of 3.5 units per hour, using air-atomized spray application, with emissions controlled by dry filters, exhausting to stacks GV22-3 and GV22-4.

(specifically regulated insignificant activities)

(c) Plant 22: A metal shop
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:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour, with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

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

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

D.4.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1, and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.4.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the dash production area (GV22-3/GV22-4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant baggage door assembly area and metal cutting operation (EU-22) shall not exceed 2.29 pounds per hour based on a maximum process weight rate of 0.42 tons per hour.

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

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

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

D.4.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the dash production area (GV22-3/GV22-4) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.4.5 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by the dash component production area (GV22-3/GV22-4) shall not exceed 3.5 pounds of VOCs per gallon of coating as delivered to the applicator, excluding water, for forced warm air dried coatings.

D.4.6 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment in the dash component production area (GV22-3/GV22-4) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.4.7 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 GV22-3/GV22-4 and the dry filters.

Compliance Determination Requirements

D.4.8 Particulate Control

In order to comply with Condition D.4.3, the cyclone shall be in operation and control particulate emissions from facility EU-22 at all times the facility is in operation.

D.4.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.4.10 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon permit issuance if training was not

completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.11 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. 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). 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.

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

D.4.12 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1 and D.4.5, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.4.1 and D.4.5. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

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

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

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

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.4.10, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.4.7, the Permittee shall maintain of records of any 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.

D.4.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 25 and 26

(specifically regulated insignificant activities)

(c) Plant 26: A White glove inspection area
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using manually-applied cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(j) Plant 25: Warehouse and Tile Floor Set:
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

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

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

D.5.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the tile cutting operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Compliance Determination Requirements

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.5.1 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, 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 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

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

D.5.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 28

(e) Plant 28: A Formtec (Thermoforming) plant, consisting of:

(1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and

(2) One (1) tank cover chemical welding operation, identified as SV28-01, constructed prior to 1985, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to stack SV28-01.

(specifically regulated insignificant activities)

(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

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

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

D.6.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.6.2 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Any change or modification which may increase the VOC potential to emit of the plastic dash component vinyl wrapping operation (EU-28) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.

(b) Any change or modification which may increase the VOC potential to emit of the tank cover chemical welding operation (SV28-01) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.6.1 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, 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 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirements

(a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.6.1 and D.6.2. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

D.6.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 29

(specifically regulated insignificant activities)

(e) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Thirteen (13) service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 and expanded in 2000, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

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

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

D.7.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Determination Requirements

D.7.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.7.1 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, 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 2-7-5(3)] [326 IAC 2-7-19]

D.7.3 Record Keeping Requirements

(a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.7.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

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

D.7.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 31 and Plant 32

(specifically regulated insignificant activities)

(f) Plant 31: Sewing, warehouse, white glove and cap assembly
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

(3) White glove inspections using some cleaners, caulks and touch-up paint; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP] and

(4) One (1) natural gas-fired boiler with a heat input capacity of 12.0 MMBtu/hr. [326 IAC 6-2-3]

(g) Plant 32: R&D (Research & Development) shop and warehouse
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) one (1) R&D CNC router [326 IAC 6-3-2]

(2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21] [326 IAC 2-2][40 CFR 52 Subpart P][326 IAC 6-3-2(d)][326 IAC 20-25]

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

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

D.8.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.8.2 Particulate Matter [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the particulate matter (PM) emissions from the boiler shall not exceed 0.6 pounds per MMBtu heat input.

D.8.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from SV32-1 shall be limited by the following:

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

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

D.8.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant R&D CNC router shall be limited by the following equation:

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

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

D.8.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from SV32-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.8.6 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which may increase the potential VOC emissions from SV32-1 to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

D.8.7 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owner or operator shall, for units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1, comply with the following provisions:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*

	HAP Monomer Content, Weight Percent
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.
* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition 8.13 is sufficient for demonstrating compliance with the HAP monomer content limits.

In lieu of meeting the HAP monomer content limits specified in this condition, the owner or operator may use monthly emission averaging across each resin and/or gel coat application category listed in subsection (a), provided that:

(1) the actual HAP emissions of all the listed FRP production units are less than the sum of the allowable emissions as identified in the across category averaging equation listed below, and

(2) the owner or operator uses any one (1) or a combination of the following emission reduction techniques:

(A) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).

(B) Vapor suppressed resins.

(C) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.

(D) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.

(E) Controlled spray used in combination with automated actuators or robots.

(F) Controlled spray that includes the following:

(i) Mold flanges.
(ii) Spray technique.
(iii) Spray gun pressure.
(iv) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product), as approved by the commissioner prior to implementation.

(G) Non-atomized application technology including flow coaters, flow choppers, pressure fed rollers, fluid impingement, or other non-spray application methods or equipment approved by IDEM, OAQ.

(H) Other approved enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards listed in subsections (a) through (c) of this condition.

For averaging across categories:

$$\Sigma E_{mA} < \Sigma (M_R * E_{Ra}) + \Sigma (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category
E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, specialty product resins from all sources.

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath

such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term “inert filler” does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.

(2) Air-assisted airless.

(3) Airless.

(4) High volume, low pressure (HVLP).

(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.8.8 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.

(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(d) Solvent collection containers shall be kept closed when not in use.

(e) Clean-up rags with solvent shall be stored in closed containers.

(f) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.
(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.8.9 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.

(e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(g) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.8.10 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 SV32-1 and the dry filters.

Compliance Determination Requirements

D.8.11 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in Condition D.8.7 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.

(b) The manufacturer's material safety data sheet.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

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

D.8.12 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.8.13 Record Keeping Requirements

(a) To document compliance with Condition D.8.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.8.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.8.7, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) Method of application and other emission reduction techniques for each resin and gel coat used;

(3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(c) To document compliance with Condition D.8.9, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(d) To document compliance with Condition D.8.12, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(e) In order to document compliance with Condition D.8.6, the Permittee shall keeps records of the total VOC input to facility SV32-1 using the information required by (a) above.

(f) To document compliance with Condition D.8.10, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.8.15 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.8.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.8.7 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 36 and 37

(f) Plant 36: A fiberglass fabrication plant, consisting of:

(1) Two (2) gelcoat booths, identified as GC36-1 and GC36-2, each constructed in 1986, each with a maximum capacity of 3.5 units per hour, gel applied using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV36-7;

(2) One (1) barrier coat spray station, identified as BC36-1, constructed in 2001, a maximum capacity of 4.0 units per hour, unfilled production resins applied using non-atomized spray application, with emissions controlled by dry filters and exhausting to stack SV36-14;

(3) Three (3) fiberglass chop booths, identified as SV36-1&2, SV36-3&4, and SV36-5&6, each constructed prior to 1985, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-1, through SV36-6;

(4) Five (5) grinding stations, identified as GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5, each constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, and each with a 100% recirculated air exhaust air steam;

(5) One (1) gelcoat booth, identified as GC36-3, constructed in 1994, a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stack SV36-12 and SV36-13;

(6) Two (2) fiberglass chop booths, identified as CS36-4 and CS36-5, constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-8 and SV36-9;

(7) One (1) closed molding operation, an alternative method to open molding operation, used when closed molding operation is viable.

(g) Plant 37: A fiberglass molding plant, consisting of:

(1) One (1) fiberglass fabricating area, identified as CS37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

(2) One (1) gel coat booth, identified as GC37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

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

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

D.9.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise

specified in 40 CFR Part 63, Subpart WWWW. The Permittee must comply with these requirements on and after April 21, 2003.

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

D.9.2 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [40 CFR Part 63, Subpart WWWW][40 CFR 63.5805]

(a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(b) The following emissions units comprise the affected source that is subject to 40 CFR Part 63, Subpart WWWW:

(1) Gelcoat booths GC36-1, GC36-2, GC36-3, GC37-1;

(2) Barrier coat spray station BC36-1;

(3) Fiberglass chop booths SV36-1&2, SV36-3&4, SV36-5&6, CS36-4, and CS36-5; and

(4) Fiberglass fabricating area CS37-1.

(5) Closed molding operation.

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are incorporated by reference.

D.9.3 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]
Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.9.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be limited by the following:

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

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

D.9.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
Pursuant to CP 039-7335-00017, issued July 24, 1997 and 326 IAC 6-3-2, the allowable particulate emission rate from the grinding stations (GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5) shall not exceed 2.29 pounds per hour each when operating at a maximum process weight rate of 0.42 tons per hour each.

The pounds per hour limitations were calculated with the following equation:

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

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

D.9.6 Particulate [326 IAC 6-3-2(d)]
Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]
Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, one (1) closed molding operation, CS37-1, and GC37-1 has been determined to be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the volatile organic HAP emissions from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period. For facilities other than the one (1) closed molding operation, compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. The emission factors used shall be approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) Compliance with the requirements of Condition D.9.8.

D.9.8 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owner or operator shall, for units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1, comply with the following provisions:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition 9.15 is sufficient for demonstrating compliance with the HAP monomer content limits.

In lieu of meeting the HAP monomer content limits specified in this condition, the owner or operator may use monthly emission averaging across each resin and/or gel coat application category listed in subsection(a), provided that:

(1) the actual HAP emissions of all the listed FRP production units are less than the sum of the allowable emissions as identified in the across category averaging equation listed below, and

(2) the owner or operator uses any one (1) or a combination of the following emission reduction techniques:

(A) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).

(B) Vapor suppressed resins.

(C) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.

(D) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.

(E) Controlled spray used in combination with automated actuators or robots.

(F) Controlled spray that includes the following:

(1) Mold flanges.

(2) Spray technique.

(3) Spray gun pressure.

(4) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product), as approved by the commissioner prior to implementation.

(G) Non-atomized application technology including flow coaters, flow choppers, pressure fed rollers, fluid impingement, or other non-spray application methods or equipment approved by IDEM, OAQ.

(H) Other approved enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards listed in subsections (a) through (c) of this condition.

For averaging across categories:

$$\Sigma E_{mA} < \Sigma (M_R * E_{Ra}) + \Sigma (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category
E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, specialty product resins from all sources.

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term “inert filler” does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.

(2) Air-assisted airless.

(3) Airless.

(4) High volume, low pressure (HVLP).

(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.9.9 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented for all fiberglass operations:

(a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.

(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(d) Solvent collection containers shall be kept closed when not in use.

(e) Clean-up rags with solvent shall be stored in closed containers.

(f) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.9.10 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.

(e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(g) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.9.11 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.9.12 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with the HAP monomer content limitations in condition D.9.8(a) shall be determined by one of the following:

(a) The manufacturer's certified product data sheets.

(b) The manufacturer's material safety data sheets.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

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

D.9.13 Operator Training Program

The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control

system. All existing operators shall be trained upon permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.9.14 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production- Notifications [40 CFR Part 63, Subpart WWWW][40 CFR 63.5905]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h).

(2) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h).

(3) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) All notifications, required by (a) above, must be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 Jackson Boulevard
Chicago, Illinois 60604-3590

D.9.15 Record Keeping Requirements

(a) To document compliance with Condition D.9.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.9.3. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.9.8(a), the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) Method of application and other emission reduction techniques for each resin and gel coat used;

(3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(c) To document compliance with Condition D.9.10, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(d) To document compliance with Condition D.9.13, the Permittee shall maintain copies of the training programs and the lists of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

D.9.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.9.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 20-25-7(c), a quarterly summary of the information to document compliance with Condition D.9.8 along with supporting calculations shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.9.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart WWWW a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than July 21, 2005 and shall be submitted to:

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

SECTION D.10 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 38

(specifically regulated insignificant activities)

(h) Plant 38: R&D machine shop and print shop
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Three (3) printing presses (moved from Plant 45) which use low-VOC soy-based inks. [40 CFR 52.21] [326 IAC 2-2]

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

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

D.10.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.10.2 Volatile Organic Compounds [326 IAC 8-5-5]

Any change or modification which may increase the total potential VOC emissions from any of the insignificant printing presses to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

Compliance Determination Requirements

D.10.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.10.1 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, 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 2-7-5(3)] [326 IAC 2-7-19]

D.10.4 Record Keeping Requirements

(a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(b) In order to document compliance with Condition D.10.2, the Permittee shall keeps records of the total VOC input to each of the printing presses.

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

D.10.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 39

(h) Plant 39: Training Center and Overflow Service Center:
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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

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

D.11.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]
Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.10.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.11.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]
Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from PB39-1 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.11.3 Particulate [326 IAC 6-3-2(d)]
Pursuant to 326 IAC 6-3-2(d), particulate from PB39-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.11.4 Volatile Organic Compounds [326 IAC 8-1-6]
Pursuant to Registration, issued January 16, 1989, any change or modification which may increase the VOC potential to emit of PB39-1 to greater than or equal to 25 tons per year must be approved by the OAQ before any such change may occur.

D.11.5 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 PB39-1 and the dry filters.

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

D.11.6 Operator Training Program
The Permittee shall implement an operator training program.

(a) All operators (except trainees) that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) 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.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.11.7 Record Keeping Requirements

(a) To document compliance with Condition D.11.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

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

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(b) In order to document compliance with Condition D.11.4, the Permittee shall keeps records of the total VOC input to facility PB39-1 using the information required by (a) above.

(c) To document compliance with Condition D.11.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.11.6, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

D.11.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION E FACILITY OPERATION CONDITIONS

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

Entire Source - for the purposes of 40 CFR Part 63, Subpart MMMM and Subpart PPPP

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

E.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart MMMM][Table 12 to 40 CFR Part 63, Subpart PPPP]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(b) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified in 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart PPPP.

(c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraphs (a) and (b) of this condition.

E.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

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

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (b)(4), that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6), which include:

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981, which are incorporated by reference.

E.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP][40 CFR 63.4481][40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP.

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

(c) The following emission units comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

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

E.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products - Notifications [40 CFR 63.3910]

(a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.

(b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.3910(b) no later than January 2, 2005.

(c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910(c) no later than March 1, 2008. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

(d) All notifications, required by (a) through (c) above, must be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 Jackson Boulevard
Chicago, Illinois 60604-3590

E.5 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products - Notifications [40 CFR 63.4510]

(a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.

(b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.4510(b).

(c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510(c). The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

(d) All notifications, required by (a) through (c) above, must be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 Jackson Boulevard
Chicago, Illinois 60604-3590

E.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart MMMM a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart PPPP a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of each standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months following the effective date of 40 CFR Part 63, Subpart PPPP and shall be submitted to:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017
Facility: Partial Paint Line A; Full Paint Lines B through E (Plant 2)
Parameter: VOC
Limit: The surface coating operations shall use less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Amount of VOC used (tons)	Total Amount of VOC used (tons)	Total Amount of VOC used (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1:			
Month 2:			
Month 3:			

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017
Facilities: Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38
Parameter: VOC
Limit: The combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR:

Month	VOC usage	VOC usage	VOC usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017
Facilities: Units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1
Parameter: Actual and allowable HAP emissions from the FRP units
BACT Limit: Actual HAP emissions from the FRP less than the allowable HAP emissions

YEAR:

Month	Actual HAP emissions (tons/month)	Actual HAP emissions (tons/month)
Month 1		
Month 2		
Month 3		

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Monaco Coach Corporation
Source Location:	400 Indiana Avenue, Wakarusa, IN 46573
County:	Elkhart
SIC Code:	3716, 3792, 3083, 3081, and 2752
Operation Permit No.:	T 039-7559-00017
Significant Source Modification No.:	039-19543-00017
Significant Permit Modification No.:	039-20873-00017
Permit Reviewer:	ERG/SD

On April 25, 2005, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Monaco Coach Corporation had applied for a Part 70 Significant Source Modification and Significant Permit Modification relating to modifications to existing partial paint line A at plant 2 (final paint plant) and plant 36 (fiberglass fabrication plant), which included the addition of two coating booths, one natural gas-fired bake oven and two air make-up units, and one closed molding operation. 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 May 12, 2005, Monaco Coach Corporation submitted comments on the proposed Significant Source Modification. The summary of the comments and responses are shown below. Deleted text will be shown as strikeout and new text will be shown as bold.

Comment 1:

The Permittee states “Monaco incorporates by reference herein the comments contained in the appeal of Title V Permit No. T039-7559-00017 (Cause No. 04-A-J-3387) as follows: “

1. Condition D.2.9(a) requires records to be available within thirty (30) days of the end of each quarter. However, this deadline is not specified in the regulations and may be an insufficient amount of time for Monaco. Therefore, Condition D.2.9(a) should be revised as follows:

   (a) To document compliance with Conditions D.2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.8.1. Records necessary to demonstrate compliance shall be available within ~~30~~ **60** days ~~if~~ **of** the end of each compliance period.

   ...

2. Condition D.2.6 requires the preparation of Preventive Maintenance Plans (PMPs) for facilities even though the underlying regulation only applies to control equipment. Therefore, Condition D.2.6 exceeds the scope of the underlying regulation and should be deleted in its entirety.

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

Response to Comment 1:

The above listed comments pertain to existing conditions that did not require revision due to the modifications covered by this permit, and are included in Monaco's appeal (draft) no. 039-19409-00017 of their Title V permit. Therefore, these comments will not be addressed at this time and shall be evaluated as part of the appeal process.

Comment 2:

The facility description (326 IAC 2-7-15) for Plant 2 under Section D.2 (b)(1) must be revised to correspond with the facility description in Section A.3 (b).

Response to Comment 2:

The facility description has been revised to match Section A.3 (B) as shown below:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) Plant 2: A final paint plant, consisting of:

(1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 1,400 full paint units (motor homes) per year or 2,500 partial paint units (motor homes) per year, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively **and consisting of**:

. . .

Comment 3:

The Permittee has claimed that "based on the comments received from IDEM, OAQ during the draft permit review, the permit sent out for Public Comment was different than the draft sent to the applicant for review. These comments resulted in additional monitoring and record keeping requirements that Monaco feels are overly burdensome with no commensurate environmental benefit. The additional monitoring creates significant hardship in that usage monitoring is changed from a facility wide basis to a line by line basis; effectively quadrupling the amount of records. All of this is being required to accommodate one new lower primer VOC limit. A primer limit that was based on incorrect definitions and represents an annual usage of about 500 gallons on this line, an estimated 700 lbs of additional emissions per year or less than 0.1 percent of permitted emissions."

Furthermore, the Permittee has claimed that " the permit sent out for Public Comment contained incorrect process descriptions. It was communicated to Monaco that IDEM, OAQ believed a more stringent primer limit found in Monaco's permit for their Coburg Oregon facility, should be included in the new BACT condition for the proposed modification. The subject of this lower VOC limit is a primer surfacer product used primarily for repair work and an insignificant consideration for the current permit modification."

The modification adds three (3) new booths to the existing line A: a basecoat booth (SV2-35), the reciprocator booth to apply clearcoat (SV2-36), and a cure booth (SV2-37). None of these new booths are expected to be used for primer application. One of the existing booths on line A (Booth SV2-27) is used to apply primer. Since this booth is performing the same process as performed prior to the line modification, it should not be subject to the new BACT.

The Permittee further adds that "in addition, the definitions used in the Coburg permit were taken from SCAQMD Rule 1152 and differed significantly from the terms and definitions provided in our BACT analysis; our definitions were an artifact from previous practices and definitions and not consistent with the SCAQMD definitions. The definitions used in the proposed permit are not consistent with the source cited for the proposed lower VOC limit and are not attainable as written. Because Monaco does not believe the existing booths are subject to the new BACT and because of the incorrect definitions used, Condition D.2.3(a)(2) should be deleted in its entirety."

Furthermore, Monaco believes "..Conditions D.2.3(a)(1) and D.2.3(b) are the same as Condition D.2.1(a) and Monaco sees no reason for its inclusion. Condition D.2.3(c) describes two (2) repair booths on Partial Paint Line A. There are no repair booths on Line A. Some incidental repairs may be made in any of the booths during normal production but these are all production booths. Not knowing the intent of this condition, Monaco requests that it be deleted in its entirety."

Response to Comment 3:

It was communicated to IDEM, OAQ on June 7, 2005 that there is no surfacer primer application in Line A except for the repair booths. Therefore, Condition D.2.3(a)(2) requiring the 2.1 pounds per gallon BACT limit for surfacer primer for the Partial Paint Line A was deleted from the permit because the surfacer primer is used for repairs in the repair booths, which are not part of the Partial Paint Line A. They are not part of the BACT review and the 2.1 pounds per gallon BACT limit does not apply. Monaco utilizes a primer, which accounts for 90 percent of the primer usage, in the Partial Paint Line A and is currently limited to 3.5 pounds per gallon pursuant to 326 IAC 8-1-6 (Condition D.2.1). Since Conditions D.2.3(a)(1) and D.2.3(b) are the same as Condition D.2.1(a), Condition D.2.3 was deleted as requested by the Permittee and subsequent conditions re-numbered as appropriate.

~~D.2.3 Volatile Organic Compounds [326 IAC 8-1-6 (BACT)]~~

~~Pursuant to 326 IAC 8-1-6(BACT), the Partial Paint Line A shall be subject to Condition D.2.1 and the following:~~

~~(a) Cleaning and Prepping Motor-home Exteriors Prior to Painting, Primer Application, and Base Coat Application~~

~~(1) Motor-home exteriors shall be hand-wiped with a cleaning solvent prior to the application of the first surface coating; and cleaning solvents shall contain a maximum of 6.5 pounds per gallon VOC for lacquer thinners and prep cleaners.~~

~~(2) Primer shall be applied using high volume-low pressure spray equipment. A sealer primer with a maximum VOC content of 3.5 pounds per gallon shall be used on bare aluminum surfaces.~~

~~(b) Base Coat and Clear Coat Application~~

~~(1) Base coats and clear coats shall be applied using high volume-low pressure spray equipment, or equivalent;~~

~~(2) Base coat/clear coat system shall be used on motor-homes coated at this facility;~~

~~(3) Clear coats shall be applied at a maximum VOC content of 3.5 pounds per gallon;~~

~~(4) Base coats shall be applied at a maximum VOC content of 6.5 pounds per gallon;~~

~~(5) Average VOC content for the base coat clear coat system shall not exceed 4.5 pounds per gallon; and~~

~~(6) Compliance demonstration formula shall be based on 2 parts clear coat and one part base coat.~~

~~(c) Production Line Paint Repairs~~

~~Air atomizing spray equipment shall be used for primer, base coat, and clear coat in the two (2) repair booths at the Partial Paint Line A. The VOC contents of the coatings shall be the same as specified in paragraph (a) and (b).~~

Comment 4:

The Permittee has claimed that "Condition D.2.4 (Volatile Organic Compounds (326 IAC 8-2-9)) contains generic RACT requirements that are supplanted by the BACT determination supplied as part of Monaco's Title V permit application and the BACT analysis contained in this permit. Therefore, Condition D.2.4 is unnecessary and should be deleted in its entirety. Also, Condition D.2.9(b) which requires record keeping to demonstrate compliance with Condition D.2.4 should be deleted in its entirety."

Response to Comment 4:

The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are triggered based on the capacity of a unit to coat metal parts, and are not supplanted by BACT requirements under 326 IAC 8-1-6 (BACT). Therefore, compliance with provisions of 326 IAC 8-1-6 (BACT) does not make the requirements of 326 IAC 8-2-9 not applicable.

Comment 5:

The Permittee has claimed that Condition D.2.10 requires the submission of quarterly reports which is not based on any regulation. In addition, the condition imposes a deadline of thirty (30) days by which those reports must be submitted that is not specified in the regulations and maybe an insufficient time for Monaco. Therefore, Condition D.2.10 should be revised as follows:

(a) A ~~quarterly~~ **semi-annual** summary of the information to document compliance with Condition D.8.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within ~~thirty (30)~~ **sixty (60)** days after the end of the ~~quarter~~ **semi-annual period** being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
...

Response to Comment 5:

326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. Therefore, no changes will be made to the quarterly report.

Comment 6:

Condition D.2.9(a)(2) including subparagraphs (A) and (B) identifies specific types of documents as part of the required records even though each of those specifically identified documents may not be necessary to demonstrate compliance. Because it could require Monaco to maintain unnecessary records, Condition D.2.9(a)(2) should be revised as follows:

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

(A) Records shall **be sufficient to demonstrate compliance and may** include purchase orders, invoices, and**/or** material safety data sheets (MSDS**s**) **as** necessary to verify the type and amount **of material** used.

...

Response to Comment 6:

The current draft language specified in Condition D.2.9(a)(2) accurately reflects the record keeping requirements associated with 326 IAC 2-2 (BACT) and 326 IAC 2-4.1(MACT), clearly stating that the records need to be complete and sufficient. The language, as written does not require the Permittee to maintain any records that are not necessary. Therefore, no changes to Condition D.2.9(a)(2) are necessary.

Comment 7:

Monaco Coach Corporation was issued first Significant Permit Modification (SPM) No.:039-15279-00017 on April 12, 2005 to add new conditions and revise some of existing conditions in Section 8 and Section 9 of existing T039-7559-0001700. The revised conditions of 1st SPM were not included in the draft permit for the 2nd SPM that was public noticed, and should be included as such.

Response to Comment 7:

The revisions are included as shown below. Since these changes have already been through the public notification process, IDEM, OAQ have determined that re-public notification is not necessary. Conditions in Section D.8 and D.9 and the Table of Contents have been renumbered and updated as necessary.

D.8.7 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

~~Pursuant to 326 IAC 20-25-3, the owners or operators of SV32-1 shall comply with the provisions of 326 IAC 20-25 on or after January 1, 2002, including:~~

~~(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:~~

~~*Fiber Reinforced Plastics Composites Products Except Watercraft*~~	~~HAP Monomer Content, Weight Percent~~
~~Resin, Manual or Mechanical Application~~	
~~Production-Specialty Products~~	~~48*~~
~~Production-Noncorrosion Resistant Unfilled~~	~~35*~~
~~Production-Noncorrosion Resistant Filled (≥35% by weight)~~	~~38~~
~~Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet~~	~~42~~
~~Production, Class I, Flame and Smoke~~	~~60*~~
~~Shrinkage Controlled~~	~~52~~
~~Tooling~~	~~43~~
~~Gel Coat Application~~	
~~Production-Pigmented~~	~~37~~
~~Clear Production~~	~~44~~
~~Tooling~~	~~45~~
~~Production-Pigmented, subject to ANSI[a] standards~~	~~45~~
~~Production-Clear, subject to ANSI[a] standards~~	~~50~~

~~[a] American National Standards Institute.~~
~~* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).~~

~~Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then~~

~~maintaining records of content and usage as specified under Condition D.8.17 is sufficient for demonstrating compliance with the HAP monomer content limits.~~

~~Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.~~

~~Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spray (if approved by IDEM, OAQ) or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:~~

~~For Averaging within a category:~~

$\Sigma Em_A \leq \Sigma (M_R * E_a)$

~~Where:~~

M_R = ~~Total monthly mass of material within each category~~
E_a = ~~Emission factor for each material based on allowable monomer content and allowable application method for each category.~~
Em_A = ~~Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls~~

~~*Units: mass = tons*~~
~~*emission factor = lbs of monomer per ton of resin or gel coat*~~
~~*emissions = lbs of monomer*~~
~~Note: Fillers may not be included when averaging.~~

~~(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:~~

~~(1) Production noncorrosion resistant, unfilled resins from all sources.~~
~~(2) Production, specialty product resins from all sources.~~
~~(3) Tooling resins used in the manufacture of watercraft.~~
~~(4) Production resin used for Class I flame and smoke products.~~

~~Nonatomized application equipment means the devices where resin or gel coat material does any of the following:~~

~~(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.~~

~~(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.~~

~~(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.~~

~~Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.~~

~~Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter~~

~~the density or other physical properties of the resin. The term "inert filler" does not include pigments.~~

~~(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:~~

~~(1) Nonatomized application technology.~~
~~(2) Air-assisted airless.~~
~~(3) Airless.~~
~~(4) High volume, low pressure (HVLP).~~
~~(5) Equivalent emission reduction technologies to subdivisions (2) through (4).~~

~~(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:~~

~~(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.~~

~~(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.~~

~~(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.~~

Pursuant to 326 IAC 20-25-3, the owner or operator shall, for units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1, comply with the following provisions:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	**48***
Production-Noncorrosion Resistant Unfilled	**35***
Production-Noncorrosion Resistant Filled (≥35% by weight)	**38**
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	**42**
Production, Class I, Flame and Smoke	**60***
Shrinkage Controlled	**52**
Tooling	**43**
Gel Coat Application	
Production-Pigmented	**37**
Clear Production	**44**
Tooling	**45**
Production-Pigmented, subject to ANSI[a] standards	**45**
Production-Clear, subject to ANSI[a] standards	**50**

[a] **American National Standards Institute.**
* **Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).**

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition 8.13 is sufficient for demonstrating compliance with the HAP monomer content limits.

In lieu of meeting the HAP monomer content limits specified in this condition, the owner or operator may use monthly emission averaging across each resin and/or gel coat application category listed in subsection (a), provided that:

(1) the actual HAP emissions of all the listed FRP production units are less than the sum of the allowable emissions as identified in the across category averaging equation listed below, and

(2) the owner or operator uses any one (1) or a combination of the following emission reduction techniques:

(A) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).

(B) Vapor suppressed resins.

(C) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.

(D) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.

(E) Controlled spray used in combination with automated actuators or robots.

(F) Controlled spray that includes the following:

(i) Mold flanges.
(ii) Spray technique.
(iii) Spray gun pressure.
(iv) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product), as approved by the commissioner prior to implementation.

(G) Non-atomized application technology including flow coaters, flow choppers, pressure fed rollers, fluid impingement, or other non-spray application methods or equipment approved by IDEM, OAQ.

(H) Other approved enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards listed in subsections (a) through (c) of this condition.

For averaging across categories:

$$\Sigma E_{mA} < \Sigma (M_R * E_{Ra}) + \Sigma (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category
E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, specialty product resins from all sources.

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.

(2) Air-assisted airless.

(3) Airless.

(4) High volume, low pressure (HVLP).

(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

~~D.8.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]~~

~~Compliance with the VOC usage limitation contained in Condition D.8.1 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, 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.~~

D.8.~~14~~**13** Record Keeping Requirements

...

(b) To document compliance with Condition D.8.7, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

~~(2) A log of the dates of use;~~

(~~3~~**2**) Method of application and other emission reduction techniques for each resin and gel coat used;

(~~4~~**3**) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

...

(d) To document compliance with Condition D.8.~~13~~ **12,** the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hours for inspection by IDEM.

...

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 has been determined to be the following:

...

(b) **Compliance with the requirements of Condition D.9.8.**~~The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:~~

~~Type of Gel Coat or Resin~~	~~HAP Monomer Content, % by weight~~
~~Production[1] Gel Coat~~	~~37~~
~~Tooling[2] Gel Coat~~	~~45~~
~~Production Resin, Manual or Mechanical Application, -- Non corrosion Resistant Filled (≥ 35% by weight)~~	~~38~~
~~Production Resin~~	~~35~~
~~Tooling Resin~~	~~43~~

~~[1] Production refers to the manufacture of parts.~~
~~[2] Tooling refers to the manufacture of the molds from which parts are manufactured~~.

~~HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.~~

~~Gel coats or resins with HAP monomer contents lower than those specified in this subsection or additional emission reduction techniques approved by IDEM, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:~~

$$\cancel{\Sigma Em_A \leq \Sigma (M_R * E_{Ra}) + \Sigma (M_G * E_{Ga})}$$

~~Where:~~

~~M_R = Total monthly mass of resins within each resin category~~
~~M_G = Total monthly mass of gel coats within each gel coats category~~
~~E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.~~
~~E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category~~
~~Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls~~
~~*Units: mass = tons*~~
~~*emission factor = lbs of monomer per ton of resin or gel coat*~~
~~*emissions = lbs of monomer*~~

~~(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, fluid impingement technology (FIT), resin impregnators, flow choppers, pressure fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ. IDEM, OAQ approval of non-atomized spray application technologies is not required if the Permittee uses one or more of the non-atomized spray technologies identified above.~~

~~If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.~~

~~(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.~~

~~HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

~~(e) The listed work practices shall be followed:~~

~~(1) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup solvent.~~
~~(2) For VOC- and/or HAP-containing materials:~~

~~(i) Cleanup solvent containers shall be used to transport solvent from drums to work.~~
~~(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.~~
~~(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.~~
~~(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.~~
~~(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~(3) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.~~

D.9.8 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]
Pursuant to 326 IAC 20-25-3, the owner or operator shall, for units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1, comply with the following provisions:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	**48***
Production-Noncorrosion Resistant Unfilled	**35***
Production-Noncorrosion Resistant Filled (≥35% by weight)	**38**
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	**42**
Production, Class I, Flame and Smoke	**60***
Shrinkage Controlled	**52**
Tooling	**43**
Gel Coat Application	
Production-Pigmented	**37**
Clear Production	**44**
Tooling	**45**
Production-Pigmented, subject to ANSI[a] standards	**45**
Production-Clear, subject to ANSI[a] standards	**50**

[a] American National Standards Institute.
*** Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).**

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition 9.15 is sufficient for demonstrating compliance with the HAP monomer content limits.

In lieu of meeting the HAP monomer content limits specified in this condition, the owner or operator may use monthly emission averaging across each resin and/or gel coat application category listed in subsection(a), provided that:

(1) the actual HAP emissions of all the listed FRP production units are less than the sum of the allowable emissions as identified in the across category averaging equation listed below, and

(2) the owner or operator uses any one (1) or a combination of the following emission reduction techniques:

(A) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).

(B) Vapor suppressed resins.

(C) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.

(D) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.

(E) Controlled spray used in combination with automated actuators or robots.

(F) Controlled spray that includes the following:
(1) Mold flanges.

(2) Spray technique.

(3) Spray gun pressure.

(4) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product), as approved by the commissioner prior to implementation.

(G) Non-atomized application technology including flow coaters, flow choppers, pressure fed rollers, fluid impingement, or other non-spray application methods or equipment approved by IDEM, OAQ.

(H) Other approved enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards listed in subsections (a) through (c) of this condition.

For averaging across categories:

$\Sigma E_{mA} < \Sigma (M_R * E_{Ra}) + \Sigma (M_G * E_{Ga})$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category
E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, specialty product resins from all sources.

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term “inert filler” does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.

(2) Air-assisted airless.

(3) Airless.

(4) High volume, low pressure (HVLP).

(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.9.9 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented for all fiberglass operations:

(a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.

(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(d) Solvent collection containers shall be kept closed when not in use.

(e) Clean-up rags with solvent shall be stored in closed containers.

(f) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

~~D.9.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]~~

~~Compliance with the VOC and HAP content limitations contained in Conditions D.9.3 and D.9.4 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, 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.~~

D.9.12 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with the HAP monomer content limitations in condition D.9.8(a) shall be determined by one of the following:

(a) The manufacturer's certified product data sheets.

(b) The manufacturer's material safety data sheets.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

D.9.1~~3~~**5** Record Keeping Requirements

(a) To document compliance with Condition~~s~~ D.9.3 ~~and D.9.4~~, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage ~~and HAP content~~ limit~~s~~ established in Condition~~s~~ D.9.3 ~~and D.9.4~~. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC ~~and HAP~~ content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC ~~and HAP~~ usage for each month.

(b) To document compliance with Condition D.9.8(a), the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) Method of application and other emission reduction techniques for each resin and gel coat used;

(3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(c) To document compliance with Condition D.9.10, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(~~b~~**d**) To document compliance with Conditions ~~D.9.5 and~~ D.9.1~~1~~**3**, the Permittee shall maintain copies of the training programs and the lists of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

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

D.9.1~~4~~**6** Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition~~s~~ D.9.3 ~~and D.9.4~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 20-25-7(c), a quarterly summary of the information to document compliance with Condition D.9.8 along with supporting calculations shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: **Monaco Coach Corporation**
Source Address: **400 Indiana Avenue, Wakarusa, IN 46573**
Mailing Address: **400 Indiana Avenue, Wakarusa, IN 46573**
Part 70 Permit No.: **T039-7559-00017**
Facilities: **Units SV32-1, GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1**
Parameter: **Actual and allowable HAP emissions from the FRP units**
BACT Limit: **Actual HAP emissions from the FRP less than the allowable HAP emissions**

YEAR:

Month	Actual HAP Emissions (tons/month)	Actual HAP Emissions (tons/month)
Month 1		
Month 2		
Month 3		

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

1. In addition, upon further review, IDEM, OAQ has changed the address throughout the permit as follows:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Monaco Coach Corporation
Source Location:	606 Nelson's Parkway, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	T039-7559-00017
Operation Permit Issuance Date:	June 21, 2004
Significant Source Modification No.:	T039-19543-00017
Significant Permit Modification No.:	T039-20873-00017
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from Monaco Coach Corporation relating to the construction and operation of the following emission units:

Plant 2: A Final Paint Plant

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

Plant 36: A Fiberglass Fabrication Plant

(7) One (1) closed molding operation, an alternative method to open molding operation, used when closed molding operation is viable.

Note: The facility descriptions are written as they appear in Sections A and D of the permit.

History

Monaco Coach Corporation is an existing multi-plant complex that assembles and paints high-quality luxury motor homes that vary in floor plan and length. A Part 70 permit (T039-7559-00017) was issued to this source on June 21, 2004. On August 31, 2004, the Permittee submitted an application to the IDEM, OAQ requesting the following modifications to existing partial paint line A at plant 2 (final paint plant) and plant 36 (fiberglass fabrication plant):

Plant 2: Partial Paint Line A

(A) Addition of two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) Addition of one (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

Plant 36: Fiberglass Fabrication Plant

(7) Addition of one (1) closed molding operation, an alternative method to open molding operation, used when closed molding operation is viable.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
SV2-35 and 36	Paint Booths	25	48"	35,000	Ambient
SV2-37	Bake Ovens	25	48"	35,000	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on August 31, 2004. Additional information was received on November 4, 2004, January 10, 2005 and February 18, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4).

Potential To Emit of Modification

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

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

Pollutant	*Potential To Emit (tons/year)
PM	4.53
PM10	4.53
SO_2	0.03
VOC	48.9
CO	4.42
NO_x	5.26

Potential to Emit of Modification after Issuance reflecting Major PSD or Emission Offset Applicability

The Permittee has provided information as part of the application for this approval that based on an Actual to Projected Actual test in 326 IAC 2-3-2 and 326 IAC 2-2-2, this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1 or Emission Offset under 326 IAC 2-3-1. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with source obligation requirements in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) because the potential to emit of VOC is greater than 25 tons per year. The Part 70 operating permit is being modified through a Part 70 Significant Permit modification pursuant to 326 IAC 2-7-12(d) because the modification involves a significant change to existing monitoring, reporting, or record keeping requirements in the permit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
1- hour Ozone	Attainment
8- hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) 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 the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) 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.

(c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	<100
PM-10	<100
SO_2	0.04
VOC	>250
CO	53.4
NOx	63.6

(a) This existing source is a major stationary source because an attainment regulated pollutant (VOC) is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions are based upon the Techical Support Document (TSD) for Part 70 Permit No.: 039-7559-00017, issued June 21, 2004.

Federal Rule Applicability

(a) This significant modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for (pollutant(s)):

(1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year; and

(2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring are not applicable.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed modification.

(c) Pursuant to T039-7559-00017, issued June 21, 2004 the surface coating operations in Plant 2 are subject to the requirements of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants - Surface Coating of Plastic Parts and Products) because the operations are located at a source which is a major source of HAPs and are used for the surface coating of plastic parts and products.

The two (2) new paint booths to the partial paint line A at Plant 2 will be subject to the requirements of 40 CFR 63, Subpart PPPP. The NESHAP requirements are not included in the Part 70 Permit at present. However, the Part 70 Permit requires the source to submit an application for a Significant Permit Modification to specify the compliance options. At that time, the Part 70 permit will be revised to include the applicable requirements of the NESHAP.

(d) Pursuant to T039-7559-00017, issued June 21, 2004, the fiberglass fabrication plant 36 is subject to the requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants - Reinforced Plastic Composites Production) because the operations are located at a source which is a major source of HAPs and are used for the production of reinforced plastic composites.

The one (1) closed molding operation at the fiberglass fabrication plant 36 will also be subject to the requirements of 40 CFR 63, Subpart WWWW. The resins used and any emission reductions gained from this operation shall not be used for averaging or weighted average emission limit calculations for the existing open molding operations.

The requirements of 40 CFR Part 63, Subpart WWWW are not included in the Part 70 Permit at present. However, the Part 70 Permit requires the source to submit an application for a Significant Permit Modification to specify the compliance options. At that time, the Part 70 permit will be revised to include the applicable requirements of the NESHAP.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-3 (Emission Offset)

Monaco Coach Corporation is not in one (1) of the twenty-eight (28) source categories and is located in Elkhart county which has been designated as nonattainment for ozone under the 8-hour standard. The source has a potential to emit each of the criteria pollutants above Part 70 major source levels and currently is operating under a Part 70 permit No. T039-7559-00017, issued June 21, 2004. On August 31, 2004 the Permittee submitted an application requesting the following:

(a) Addition of one (1) closed molding operation at their existing fiberglass fabrication plant 36 to be used when closed molding operation is viable. The Permittee did not provide any emission calculations for the closed molding operation and emissions are expected to be minimal.

(b) Construction and operation of two (2) new coating booths (SV2-35 and SV2-36), one (1) natural gas-fired Bake Oven (SV2-37) and two (2) natural gas-fired air make-up units, each having a maximum heat input capacities of 4.00 MMBtu per hour, to be used in conjunction with their Partial Paint Line A at their existing Plant 2 - Surface Coating Operations. One of the new booths (SV2-36) will employ reciprocator technology for coating application, which is intended to improve transfer efficiencies and paint quality, i.e. reduce repairs on motor homes. The source analysis predicts a twenty-five percent (25%) reduction in paint usage using this technology. The potential to emit of VOC from this modification is equal to 48.9 tons per year, which exceeds significant levels.

However, the Permittee has made a claim in their permit application that based on Actual to Projected Actual test in 326 IAC 2-3-2 and 326 IAC 2-2-2, this modification at a major stationary source will not be major for Emission Offset under 326 IAC 2-3-1 and Prevention of Significant Deterioration under 326 IAC 2-2-1. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The Permittee will be required to keep records and report in accordance with source obligation requirements in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2. Morever, the Permittee shall continue to comply with the PSD requirements as listed in Section D.2 of their Part 70 Permit.

326 IAC 2-4.1 (Hazardous Air Pollutants)

Pursuant to SSM 039-15620-00017, issued December 11, 2002 and T039-7559-00017, issued June 21, 2004, the Partial Paint Line A is subject to the requirements of 326 IAC 2-4.1.
Since the proposed modification includes the addition of coating booths to existing Partial Paint Line A, this modification shall comply with the requirements of 326 IAC 2-4.1 as described in the Part 70 Permit No. 039-7559-00017, Condition D.2.1 (See revised permit).

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 shall meet the following, unless otherwise stated in the 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.

326 IAC 20-25 (Emissions From Reinforced Plastics Composites Fabricating Emission Units):

Pursuant to T039-7559-00017, issued June 21, 2004, the facilities specified under Plant 36 (Fiberglass Fabrication Plant) are not subject to the requirements of 326 IAC 20-25 because pursuant to 326 IAC 20-25-1(b) and 326 IAC 20-25-3(e), these facilities obtained a revised BACT determination after June 28, 1998 and before January 1, 2002 (SSM 039-12758-00017, issued May 15, 2001).

The Permittee has requested to include one (1) closed molding operation under the existing Plant 36 (Fiberglass Fabrication Plant) to be used for some small parts at their facility, when closed molding operation is viable. The Permittee did not provide any emission calculations for the closed molding operation and emissions are expected to be minimal. Morever, none of the existing facilities are being modified. Therefore, the one (1) closed molding operation is not subject to the requirements of 326 IAC 20-25.

State Rule Applicability - Two (2) New Coating Booths (SV2-35 and Sv2-36)

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to T039-7559-00017, issued June 21, 2004 and 40 CFR Subpart P, the particulate matter (PM) from the surface coating operations (booths SV2-35 and SV2-36) shall be limited by the following:

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

$E = 4.10\ P0.67$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Under the rule revision, particulate from the surface coating operations (booths SV2-35 and SV2-36) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities: General Emission Reductions)

The potential VOC emissions from the addition of two (2) new coating booths (identified as SV2-35 and SV2-36) are greater than twenty-five (25) tons per year each. Based on the submitted BACT analysis (see Appendix C), IDEM, OAQ has determined BACT to be equivalent to current Part 70 Permit BACT conditions (D.2.1 - PSD BACT) and the following requirements:

(a) Cleaning and Prepping Motor-home Exteriors Prior to Painting, Primer Application, and Base Coat Application

(1) Motor-home exteriors shall be hand-wiped with a cleaning solvent prior to the application of the first surface coating; and cleaning solvents shall contain a maximum of 6.5 pounds per gallon VOC for lacquer thinners and prep cleaners.

(2) Primer shall be applied using high volume-low pressure spray equipment. A sealer (adhesion) primer with a maximum VOC content of 3.5 pounds per gallon shall be used on bare aluminum surfaces, while other surfaces shall be primed with a primer surface with a maximum VOC content of 2.1 pounds per gallon.

(b) Base Coat and Clear Coat Application

(1) Base coats and clear coats shall be applied using high volume-low pressure spray equipment, or equivalent;

(2) Base coat/clear coat system shall be used on motor-homes coated at this facility;

(3) Clear coats shall be applied at a maximum VOC content of 3.5 pounds per gallon;

(4) Base coats shall be applied at a maximum VOC content of 6.5 pounds per gallon;

(5) Average VOC content for the base coat clear coat system shall not exceed 4.5 pounds per gallon; and

(6) Compliance demonstration formula shall be based on 2 parts clear coat and one part base coat.

(c) Production Line Paint Repairs

Air atomizing spray equipment shall be used for primer, base coat, and clear coat in the two (2) repair booths at the Partial Paint Line A. The VOC contents of the coatings shall be the same as specified in paragraph (a) and (b).

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

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002 and T039-7559-00017, issued June 21,2004, when coating metal parts any change or modification which may increase the maximum capacity of the Partial Paint Line A to greater than 35 vehicles per day must be approved by the IDEM, OAQ before any such change may occur.

State Rule Applicability - Closed Molding Operation

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain as the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

The one (1) closed molding operation is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it does not result in any particulate emissions.

326 IAC 8-1-6 (New Facilities: General Emission Reductions)

The Permittee has not provided any supporting calculations for the addition of one (1) closed molding operation. Emissions are expected to be minimal. However, the one (1) closed molding operation shall comply with existing VOC BACT requirements pursuant to 326 IAC 8-1-6 (as given in Part 70 Permit No. 039-7559-00017, issued June 21, 2004, Condition D.9.7) that limits Plant 36 - Fiberglass Fabrication Plant and Plant 37 to less than 249 tons per twelve (12) consecutive month period and shall be subject to the existing work practice standards (Condition D.9.7(e)).

State Rule Applicability - Bake Oven and Two (2) Air Make-up Units Burning Natural Gas

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

The natural gas-fired bake oven and two (2) air make-up units are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from these units are from combustion only.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion units (bake oven and air make-up units) are not subject to the provisions of 326 IAC 6-2 (Emission Limitations for Sources of Indirect Heating) because these units are not boilers or process heaters.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as described in Section D.2 and Section D.9 of Part 70 Permit No.: 039-7559-00017, issued June 21, 2004.

Proposed Changes

Bold language has been added, language with a line through it has been deleted.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source that is a multiple-plant complex that assembles and paints high-quality, luxury motor homes that vary in floor plan and length.

Responsible Official:	Chief Administrative Officer/ Senior Vice President
Source Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Mailing Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Source Phone Number:	(260) 862-7347
SIC Code:	3716
County Location:	Elkhart

Source Location Status: Nonattainment for all ozone under the 8-hour standard;
Attainment for **ozone under the 1-hour standard and for** all other criteria pollutants

Source Status: Part 70 Permit Program
Major Source, under PSD and Nonattainment NSR
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

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:

. . . .

(b) Plant 2: A final paint plant, consisting of:

(1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of ~~10~~ **1,400 full paint** units (motor homes) per **year of 2,500 partial paint units (motor homes) per year** ~~day~~, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively **and consisting of:**~~;~~

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

. . . .

(f) Plant 36: A fiberglass fabrication plant, consisting of:

. . . .

(7) One (1) closed molding operation, an alternative method to open molding operation, used when closed molding operations is viable.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) Plant 2: A final paint plant, consisting of:

(1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of ~~10~~ **1,400 full paint** units (motor homes) per **year or 2,500 partial paint units (motor homes) per year** ~~day~~, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively **and consisting of:**~~;~~

(A) Two (2) coating booths, identified as SV2-35 and SV2-36, applying basecoat and clear RTS, with booth SV2-35 using HVLP equipment or its equivalent, and booth SV2-36 using reciprocator technology to apply coating material, and controlled by dry filters;

(B) One (1) natural gas-fired bake oven, identified as SV2-37, with a maximum heat input capacity of 4.0 MMBtu per hour; and

(C) Two (2) natural gas-fired air make-up units, each with a maximum heat input capacity of 4.0 MMBtu per hour.

. . . .

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

D.2.3 Volatile Organic Compounds [326 IAC 8-1-6(BACT)]

Pursuant to 326 IAC 8-1-6(BACT), Partial Paint Line A shall be subject to Condition D.2.1 and the following:

(a) Cleaning and Prepping Motor-home Exteriors Prior to Painting, Primer Application, and Base Coat Application

(1) Motor-home exteriors shall be hand-wiped with a cleaning solvent prior to the application of the first surface coating; and cleaning solvents shall contain a maximum of 6.5 pounds per gallon VOC for lacquer thinners and prep cleaners.

(2) Primer shall be applied using high volume-low pressure spray equipment. A sealer (adhesion) primer with a maximum VOC content of 3.5 pounds per gallon shall be used on bare aluminum surfaces, while other surfaces shall be primed with a primer surface with a maximum VOC content of 2.1 pounds per gallon.

(b) Base Coat and Clear Coat Application

(1) Base coats and clear coats shall be applied using high volume-low pressure spray equipment, or equivalent;

(2) Base coat/clear coat system shall be used on motor-homes coated at this facility;

(3) Clear coats shall be applied at a maximum VOC content of 3.5 pounds per gallon;

(4) Base coats shall be applied at a maximum VOC content of 6.5 pounds per gallon;

(5) Average VOC content for the base coat clear coat system shall not exceed 4.5 pounds per gallon; and

(6) Compliance demonstration formula shall be based on 2 parts clear coat and one part base coat.

(c) Production Line Paint Repairs

Air atomizing spray equipment shall be used for primer, base coat, and clear coat in the two (2) repair booths at the Partial Paint Line A. The VOC contents of the coatings shall be the same as specified in paragraph (a) and (b).

D.2.~~3~~**4** Volatile Organic Compounds [326 IAC 8-2-9]

When coating metal parts, a~~A~~ny change or modification which may increase the maximum capacity of any paint line (partial paint line A and full paint lines B through E) to greater than 35 vehicles (motor homes) per day must be approved by the OAQ before any such change may occur.

D.2.~~4~~**5** Particulate [326 IAC 6-3-2(d)]

D.2.~~5~~**6** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.2.~~6~~**7** Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition**s** D.2.~~3~~**1 and D.2.3** 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, 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.

D.2.~~7~~**8** Operator Training Program

D.2.~~8~~**9** Record Keeping Requirements

(a) To document compliance with Condition**s** D.2.1 **and D.2.3**, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition**s** D.2.1 **and D.2.3**. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

. . . .

(b) To document compliance with Condition D.2.~~3~~**4**, the Permittee shall maintain daily records of the number of vehicles painted on each paint line in that day.

(c) To document compliance with Condition D.2.~~7~~**8**, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(d) To document compliance with Condition D.2.~~5~~**6**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

. . . .

D.2.~~9~~**10** Reporting Requirements

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 36 and 37

(f) Plant 36: A fiberglass fabrication plant, consisting of:

. . . .

(7) One (1) closed molding operation, an alternative method to open molding

operation, used when closed molding operation is viable.

. . . .

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

D.9.2 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [40 CFR Part 63, Subpart WWWW][40 CFR 63.5805]

. . . .

(b) The following emissions units comprise the affected source that is subject to 40 CFR Part 63, Subpart WWWW:

. . . .

(5) Closed molding operation.

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, **one (1) closed molding operation,** CS37-1, and GC37-1 has been determined to be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the volatile organic HAP emissions from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period. **For facilities other than the one (1) closed molding operation,** compliance with this limit shall be determined based upon the following criteria:

. . . .

(f) Compliance with VOC limit specified in subsection (a) for the one (1) closed molding operation shall be determined by following the requirements specified in subsection (e) of this condition.

Upon further review, IDEM, OAQ has made the following changes to the permit:

(a) 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, U.S. EPA will object to the permits. An updated version of Condition - B.24 Credible Evidence has been incorporated in the revised permit.

(b) The mailing address of IDEM, OAQ has been changed as follows:

100 North Senate Avenue
Indianapolis, Indiana 46204

This change has been made throughout the whole permit.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-19543-00017 and Part 70 Significant Permit Modification 039-20873-00017.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Air Make-Up Units and One (1) Bake Oven each rated at 4.00 MMBtu per Hour

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: March 2, 2005

Heat Input Capacity (MMBtu/hour)		Potential Throughput (MMCF/year)
12.00	(3 units total)	105.1

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.40	0.40	0.03	5.26	0.29	4.42

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Air Make-Up Units and One (1) Bake Oven each rated at 4.00 MMBtu per Hour

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HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.10E-04	6.31E-05	3.94E-03	9.46E-02	1.79E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	2.63E-05	5.78E-05	7.36E-05	2.00E-05	1.10E-04

TOTAL HAPs (tons/year) = 9.92E-02

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Modified Partial Paint Line A (Addition of Two (2) New Coating Booths)

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: March 2, 2005

New Emission Units	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (gal/unit)	Max. Throughput (units/year)	Pounds VOC per gallon of coating	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/year) Uncontrolled	* Transfer Efficiency
SV2-35 New Booth	Basecoat	7.60	81.0%	0.10%	80.9%	0.0%	28.0%	4.20	1400	6.15	18.1	1.06	75%
SV2-36 New Reciprocator	Clear RTS	8.40	60.0%	0.10%	59.9%	0.0%	40.0%	8.70	1400	5.03	30.6	3.07	85%
TOTAL										PTE from new booths (tons/year) =	**48.7**	**4.13**	

Emission Unit	** Control Efficiency	PTE of PM/PM10 (tons/year) After Control
SV2-35 New Booth	98%	0.02
SV2-36 New Reciprocator	98%	0.06
PTE from new booths (tons/year) =		**0.08**

* Material applied in booth SV2-36 with a paint reciprocator having 85 % efficiency. Other booth utilizes HVLP gun.
** Controls = Dry filters

METHODOLOGY
Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lb/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage (gal/unit) * Max. Thoughput (units/hour)
PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage (gal/unit) * Max.Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) Uncontrolled = Density (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1ton/2000 lbs
PTE of PM/PM10 (tons/year) Uncontrolled = Density (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1ton/2000 lbs * (1- Control Efficiency %)

Appendix A: Emissions Calculations
Summary

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
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Date: March 2, 2005

Uncontrolled Potential to Emit (tons/year)

	PM	PM10	SO_2	NOx	VOC	CO
Future PTE (Modified Line A)	4.13	4.13	0.00	0.00	48.7	0.00
New Combustion Units	0.40	0.40	0.03	5.26	0.29	4.42
	4.53	**4.53**	**0.03**	**5.26**	**49.0**	**4.42**

Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO)

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

Regenerative Thermal Oxidizer (RTO)

Design Air Flow Rate (scfm):		100,000	(provided by source)
I. Capital Cost			
	(formula)*		
1. Purchased Equipment:			
Basic Equipment & Auxiliaries (A)		$1,204,140	(provided by source)
Instruments & controls	0.10 A	$120,414	(separate from the price quote)
Taxes	0.05 A	$60,207	(Indiana Tax Code)
Freight	0.05 A	$60,207	
Total Purchase Cost (B)		**$1,444,968**	
2. Direct Installation Costs:			
Support Installation	0.08 B	$115,597	
Erection & Handling	0.14 B	$202,296	
Electrical	0.04 B	$57,799	
Enclosure		NA	
Piping	0.02 B	$28,899	
Insulation	0.01 B	$14,450	
Painting	0.01 B	$14,450	
Site Preparation (As required)		$0	
Facilities and buildings (As required)		$0	
Total Direct Installation Cost (C)		**$433,490**	
Total Direct Capital Cost (TDC)	**(B+C)**	**$1,878,458**	
3. Indirect Costs:			
Engineering	0.10 B	$144,497	
Loss of Production Cost		$0	
Construction & Field Expenses	0.05 B	$72,248	
Start Up	0.02 B	$28,899	
Performance Tests	0.01 B	$14,450	
Contingencies	0.03 B	$43,349	
Total Indirect Cost (D)		**$303,443**	
Total Install Capital Cost	**(B+C+D)**	**$2,181,902**	
Capital Recovery Factor (7%, 10 year)		0.1424	
Capital Recovery Cost (E)		**$310,659**	

Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO)

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Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

II. ANNUALIZED COSTS

1. Direct Operating Costs:				
Operating Labor (F)			$5,000	
a. Number of Employees			*1.00*	
b. Cost/Employee/Hour			*$20.0*	(provided by source)
c. Operating Hours/Year			*250*	
Supervisory Labor (F1)	0.15	F	$750	
Maintenance Labor (F2)			$5,000	
a. Number of Employees			*1.00*	
b. Cost/Employee/Hour			*$20.0*	(provided by source)
c. Operating Hours/Year			*250*	
Maintenance Material (F3)	1	F2	$5,000	
Utilities				
a. Natural Gas			$52,539	
MMBTU/HR Input			*0.84*	
Operating Hours/Year			*8,760*	(provided by source)
Cost/MMBTU			*$7.14*	(rate in Indiana)
b. Electricity			$19,754	
KW Requirements/Hr			*41.0*	
KWH/YR			*8,760*	(provided by source)
Cost/KWH			*$0.055*	(national ave.)
Water			$0	
Air			$0	
Replacement Parts			$0	
Total Direct Operating Cost (G)			**$88,043**	
2. Indirect Operating Costs:				
Overhead	0.6	**(F+F1+F2+F3)**	$9,450	
Insurance, and Administrative Costs	0.03	**(B+C+D)**	$65,457	
Total Indirect Operating Cost (H)			**$74,907**	
3. Heat Recovery Credits (I):			**$22,710**	
MMBTU/HR Input			*0.84*	
Operating Hours/Year			*8,760*	
Unit Heat Efficiency			*95%*	
Heat Exchange Efficiency			*65%*	
Percent Heat Recovery			*70%*	
Cost/MMBTU			*$7.14*	(rate in Indiana)
Total Annual Operating Cost		**(G+H-I)**	**$140,240**	

Total Annualized Cost		**(E+G+H-I)**	**$450,899**
Uncontrolled PTE (tons/yr)	**48.7**	(as calculated in Appendix A)	
Overall Control Efficiency			**95.0%**
Pollution Removed (tons/yr)			**46.3**
Cost Effectiveness ($ /ton VOC removed)			**$9,746**

Appendix C: Cost Analysis for Control Devices
Rotary Concentrator with Regenerative Thermal Oxidizer

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

Concentrator with Regenerative Thermal Oxidizer

Design Air Flow Rate (scfm):		100,000	(provided by source)
I. Capital Cost			
	(formula)*		
1. Purchased Equipment:			
Basic Equipment & Auxiliaries (A)		$1,645,000	(provided by source)
Instruments & controls	0.10 A	$164,500	(separate from the price quote)
Taxes	0.05 A	$82,250	(Indiana Tax Code)
Freight	0.05 A	$82,250	
Total Purchase Cost (B)		**$1,974,000**	
2. Direct Installation Costs:			
Support Installation	0.08 B	$157,920	
Erection & Handling	0.14 B	$276,360	
Electrical	0.04 B	$78,960	
Enclosure		NA	
Piping	0.02 B	$39,480	
Insulation	0.01 B	$19,740	
Painting	0.01 B	$19,740	
Site Preparation (As required)		$0	
Facilities and buildings (As required)		$0	
Total Direct Installation Cost (C)		**$592,200**	
Total Direct Capital Cost (TDC)	**(B+C)**	**$2,566,200**	
3. Indirect Costs:			
Engineering	0.10 B	$197,400	
Loss of Production Cost		$0	
Construction & Field Expenses	0.05 B	$98,700	
Start Up	0.02 B	$39,480	
Performance Tests	0.01 B	$19,740	
Contingencies	0.03 B	$59,220	
Total Indirect Cost (D)		**$414,540**	
Total Install Capital Cost	**(B+C+D)**	**$2,980,740**	
Capital Recovery Factor (7%, 10 year)		0.1424	
Capital Recovery Cost (E)		**$424,398**	

Appendix C: Cost Analysis for Control Devices
Rotary Concentrator with Regenerative Thermal Oxidizer

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SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

II. ANNUALIZED COSTS

1. Direct Operating Costs:				
Operating Labor (F)			$5,000	
a. Number of Employees			*1.00*	
b. Cost/Employee/Hour			*$20.0*	(provided by source)
c. Operating Hours/Year			*250*	
Supervisory Labor (F1)	0.15	F	$750	
Maintenance Labor (F2)			$5,000	
a. Number of Employees			*1.00*	
b. Cost/Employee/Hour			*$20.0*	(provided by source)
c. Operating Hours/Year			*250*	
Maintenance Material (F3)	1	F2	$5,000	
Utilities				
a. Natural Gas			$52,539	
MMBTU/HR Input			*0.84*	
Operating Hours/Year			*8,760*	(provided by source)
Cost/MMBTU			*$7.14*	(rate in Indiana)
b. Electricity			$19,754	
KW Requirements/Hr			*41.0*	
KWH/YR			*8,760*	(provided by source)
Cost/KWH			*$0.055*	(national ave.)
Water			$0	
Air			$0	
Replacement Parts	0.05	A	$0	
Total Direct Operating Cost (G)			**$88,043**	
2. Indirect Operating Costs:				
Overhead	0.6	**(F+F1+F2+F3)**	$9,450	
Insurance, and Administrative Costs	0.03	**(B+C+D)**	$89,422	
Total Indirect Operating Cost (H)			**$98,872**	
3. Heat Recovery Credits (I):			**$22,710**	
MMBTU/HR Input			*0.84*	
Operating Hours/Year			*8,760*	
Unit Heat Efficiency			*95%*	
Heat Exchange Efficiency			*65%*	
Percent Heat Recovery			*70%*	
Cost/MMBTU			*$7.14*	(rate in Indiana)
Total Annual Operating Cost		**(G+H-I)**	**$164,205**	
Total Annualized Cost		**(E+G+H-I)**	**$588,603**	
Uncontrolled PTE (tons/yr)	**48.7**	(as calculated in Appendix A)		
Overall Control Efficiency			**95.0%**	
Pollution Removed (tons/yr)			**46.3**	
Cost Effectiveness ($ /ton VOC removed)			**$12,722**	

Appendix C: Cost Analysis for Control Devices
Rotary Zeolite Absorption with Catalytic Oxidizer

Company Name: Monaco Coach Corporation
Address: 606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV: 039-19543
SPM to TV: 039-20873
Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

Rotary Zeolite Absorption with Catalytic Oxidizer

Design Air Flow Rate (scfm):		50,000	(provided by source)
I. Capital Cost			
	(formula)*		
1. Purchased Equipment:			
Basic Equipment & Auxiliaries (A)		$739,500	(provided by source)
Instruments & controls	0.10 A	$73,950	(separate from the price quote)
Taxes	0.05 A	$36,975	(Indiana Tax Code)
Freight	0.05 A	$36,975	
Total Purchase Cost (B)		**$887,400**	
2. Direct Installation Costs:			
Support Installation	0.08 B	$70,992	
Erection & Handling	0.14 B	$124,236	
Electrical	0.04 B	$35,496	
Enclosure		NA	
Piping	0.02 B	$17,748	
Insulation	0.01 B	$8,874	
Painting	0.01 B	$8,874	
Site Preparation (As required)		$0	
Facilities and buildings (As required)		$0	
Total Direct Installation Cost (C)		**$266,220**	
Total Direct Capital Cost (TDC)	**(B+C)**	**$1,153,620**	
3. Indirect Costs:			
Engineering	0.10 B	$88,740	
Loss of Production Cost		$0	
Construction & Field Expenses	0.05 B	$44,370	
Start Up	0.02 B	$17,748	
Performance Tests	0.01 B	$8,874	
Contingencies	0.03 B	$26,622	
Total Indirect Cost (D)		**$186,354**	
Total Install Capital Cost	**(B+C+D)**	**$1,339,974**	
Capital Recovery Factor (7%, 10 year)		0.1424	
Capital Recovery Cost (E)		**$190,785**	

Appendix C: Cost Analysis for Control Devices
Rotary Zeolite Absorption with Catalytic Oxidizer

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Plt ID: 039-00017
Reviewer: ERG/SD
Date: April 11, 2005

II. ANNUALIZED COSTS

1. Direct Operating Costs:			
Operating Labor (F)		$5,000	
a. Number of Employees		*1.00*	
b. Cost/Employee/Hour		*$20.0*	(provided by source)
c. Operating Hours/Year		*250*	
Supervisory Labor (F1)	0.15 F	$750	
Maintenance Labor (F2)		$5,000	
a. Number of Employees		*1.00*	
b. Cost/Employee/Hour		*$20.0*	(provided by source)
c. Operating Hours/Year		*250*	
Maintenance Material (F3)	1 F2	$5,000	
Utilities			
a. Natural Gas		$52,539	
MMBTU/HR Input		*0.84*	
Operating Hours/Year		*8,760*	(provided by source)
Cost/MMBTU		*$7.14*	(rate in Indiana)
b. Electricity		$19,754	
KW Requirements/Hr		*41.0*	
KWH/YR		*8,760*	(provided by source)
Cost/KWH		*$0.055*	(national ave.)
Water		$0	
Air		$0	
Replacement Parts		$13,929	(as per vendor information)
Total Direct Operating Cost (G)		**$101,972**	
2. Indirect Operating Costs:			
Overhead	0.6 **(F+F1+F2+F3)**	$9,450	
Insurance, and Administrative Costs	0.03 **(B+C+D)**	$40,199	
Total Indirect Operating Cost (H)		**$49,649**	
3. Heat Recovery Credits (I):		**$22,710**	
MMBTU/HR Input		*0.84*	
Operating Hours/Year		*8,760*	
Unit Heat Efficiency		*95%*	
Heat Exchange Efficiency		*65%*	
Percent Heat Recovery		*70%*	
Cost/MMBTU		*$7.14*	(rate in Indiana)
Total Annual Operating Cost	**(G+H-I)**	**$128,911**	
Total Annualized Cost	**(E+G+H-I)**	**$319,697**	
Uncontrolled PTE (tons/yr)	**48.7**	(as calculated in Appendix A)	
Overall Control Efficiency		**90.0%**	
Pollution Removed (tons/yr)		**43.8**	
Cost Effectiveness ($ /ton VOC removed)		**$7,294**	

Appendix C: Cost Analysis for Control Devices
Summary

Company Name:	Monaco Coach Corporation
Address:	606 Nelson's Parkway, Wakarusa, Indiana 46573
SSM to TV:	039-19543
SPM to TV:	039-20873
Plt ID:	039-00017
Reviewer:	ERG/SD
Date:	April 11, 2005

NOTES:

1. The cost analysis formula is from EPA Air Pollution Control Cost Manual, Sixth Edition (01/02).
2. The control efficiency is as provided by the manufacturer, including capture efficiency and destruction efficiency.
3. The energy price for industrial use in December, 2004 is from the webpage for Energy Information Administration. http://www.eia.doe.gov/
4. Instruments & Controls are listed as separate quotes since interlocks to the booths, duct dampers, and computer tracking system are not included in the basic equipement cost.

Energy Penalty Calculation

Emission factor for NOx (in lbs/MMSCF) =	100
Flow Rate (scfm) =	100000
Hours of Operation hours/year) =	2250
NOx emitted (MMSCF/year) =	13500
NOx emitted (tons/year) =	675
VOC controlled (tons/year) =	48.7
lb NOx per lb VOC controlled =	13.9

1 SCF = 1,000 Btu
Emission factor is from AP-42, Chapter 1.4 (Natural Gas Combustion), July, 1998.

Methodology

NOx emitted (MMSCF/year) = Flow rate (scfm) * 60 min/hour * hours of operation per year * 1 MMSCF/10^6 SCF.
NOx emitted (tons/year) = Nox emitted (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs.