



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: March 24, 2005  
RE: Coachmen Recreational Vehicle Company, LLC / MSM 039-20911-00062  
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 approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

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Mr. Michael Terlep  
Coachmen Recreational Vehicle Company, LLC  
P.O. Box 30 Bldg. 9  
Middlebury, Indiana 46540

March 24, 2005

Re: 039-20911-00062  
Minor Source Modification to:  
Part 70 permit No.: T039-6922-00062

Dear Mr. Terlep:

Coachmen Recreational Vehicle Company, LLC was issued Part 70 operating permit T039-6922-00062 on June 9, 1999 for the production of RVs. An application to modify the source was received on March 7, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) spray booth, identified as Plant 250 Touch-Up Repair Booth, equipped with dry filters for particulate overspray control, exhausting to Stack S11, capacity: 0.75 recreational vehicles per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified

in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments

APD

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



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## MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Coachmen Recreational Vehicle Company, LLC  
Middlebury Facility  
423 North Main Street  
Middlebury, Indiana 46540**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 039-20911-00062	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2005

**SECTION D.6 FACILITY OPERATION CONDITIONS**

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

(i) One (1) spray booth, identified as Plant 250 Touch-Up Repair Booth, equipped with dry filters for particulate overspray control, exhausting to Stack S11, capacity: 0.75 recreational vehicles per hour.

(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 Particulate Matter (PM) [40 CFR 52 Subpart P]**

Pursuant to 40 CFR 52 Subpart P, the PM from the one (1) spray booth, identified as Plant 250 Touch-Up Repair Booth 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:

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

**D.6.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]**

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.6.5, Notification Requirements.

**D.6.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

- (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. 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 April 19, 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, except as otherwise provided in this condition. The permit shield applies to Condition D.6.5, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 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 CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

### Compliance Determination Requirements

#### D.6.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the spray booth, identified as Plant 250 Touch-Up Repair Booth shall be controlled by a dry filter; waterwash; or an equivalent control device and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

### RECORD KEEPING AND REPORTING REQUIREMENTS

#### D.6.5 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

#### D.6.6 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 regarding which compliance option or options will be chosen in the Part 70 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 Part 70 permit the applicable requirements of 40 CFR 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 the standard.

- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

**Technical Support Document (TSD) for a Part 70 Minor Source  
Modification and Minor Permit Modification**

**Source Background and Description**

**Source Name:** Coachmen Recreational Vehicle Company, LLC  
**Source Location:** 423 North Main St. Middlebury, IN 46540  
**County:** Elkhart  
**SIC Code:** 3792, 3716  
**Operation Permit No.:** T 039-6922-00062  
**Operation Permit Issuance Date:** June 9, 1999  
**Minor Source Modification No.:** 039-20911-00062  
**Minor Permit Modification No.:** 039-20937-00062  
**Permit Reviewer:** Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Coachmen Recreational Vehicle Company, LLC, a recreational vehicle manufacturing plant relating to the construction of the following emission units and pollution control devices:

- (a) One (1) spray booth, identified as Plant 250 Touch-Up Repair Booth, equipped with dry filters for particulate overspray control, exhausting to Stack S11, capacity: 0.75 recreational vehicles per hour.

The installation of this new Spray Touch-Up Booth will not increase the source production nor it will affect existing emission units. Currently, finish parts that require touch-up to fix scratches are shipped to another plant.

**History**

On March 7, 2005, Coachmen Recreational Vehicle Company, LLC submitted an application to the OAQ requesting to add additional surface coating booth to their existing plant. Coachmen Recreational Vehicle Company, LLC was issued a Part 70 permit on June 9, 1999.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-11	touch-up spray booth	34	3.5	24,460	ambient

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor 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 March 7, 2005.

### Emission Calculations

See Pages 1 and 2 of 2 TSD Appendix A for detailed emission calculations.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.7
PM-10	2.7
SO <sub>2</sub>	0.0
VOC	7.53
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Xylene	1.21
Toluene	2.12
Methyl Methacrylate	0.06
Cumene	0.13
Ethyl Benzene	0.26
Worst Single HAP	2.12
Combined HAPs	3.78

### Justification for Modification

- (a) The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5), as it is a modification with the most stringent applicable requirements is the NESHAP.
- (b) The Part 70 Operating Permit is being modified through a Part 70 Minor Permit Modification. Although 326 IAC 2-7-12(E) states that Title 1 of the CAA modifications are subject to a significant permit modification, this modification will be issued a Minor Permit Modification under 326 IAC 2-7-12 since only the NESHAP notification requirements will be required.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8 hour Ozone	Nonattainment
1 hour Ozone	Attainment
CO	Attainment
Lead	Not Determined

- (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 nonattainment for the 8-hour ozone standard. 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 for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status**

Existing Source PSD or Emission Offset and Part 70 Definition (emissions after controls, based upon 8760 hours of operation per year taken from the Part 70 Permit T039-6922-00062, issued on June 9, 1999; and Minor Source Modification No.: 039-17850-00062, issued on October 21, 2003):

Pollutant	MSM 039-17850-00062	T039-6922-00062	TOTAL Emissions (tons/year)
	Emissions (tons/year)	Emissions (tons/year)	
PM	12.31	35.5	47.81
PM-10	12.31	30.5	42.81
SO <sub>2</sub>	-	1.0	1.0
VOC	23.94	249.0	272.94
CO	-	1.0	1.0
NOx	-	2.0	2.0
Single HAP	-	32.8	32.8
Combined HAPs	-	144.0	144.0

- (a) This existing source is a major stationary source under 326 IAC 2-3 (Emission Offset) because VOC a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is not one of the 28 listed source categories.
- (b) This existing source is a major stationary source under 326 IAC 2-7 (Part 70 Permit Program) because VOC is emitted at a rate of 100 tons per year or more, or Single HAP

is emitted at a rate of 10 tons per year or greater, or the combined HAPs is emitted at a rate of 25 tons/year or greater.

**Potential to Emit of Modification**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Plant 250 Touch-Up Repair Booth	0.59	0.59	0.0	7.52	0.0	0.0	Single HAP 2.12 Combined HAPs 3.78
Significant Levels	25	15	40	40	40	100	-

- (a) This modification to an existing major stationary source is not major because the VOC emissions increase is less than the Emission Offset significant level of 40 tons/yr. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) This modification to an existing major stationary source is not major because PM and PM10 both attainment pollutants are emitted at less than the PSD significant levels of 25 tons per year and 15 tons per year, respectively. Therefore, pursuant to 326 IAC 2-2, PSD requirements do not apply.

**Source Potential to Emit After Modification**

Pollutant	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Existing Source PTE Level	47.81	42.81	1.0	272.94	1.0	2.0	Single - 32.8 Combined - 144.0
Total Source PTE After Modification Issuance	38.09	43.4	1.0	280.46	1.0	2.0	Single -34.92 Combined - 147.8

**Federal Rule Applicability**

This modification to an existing major stationary source is not major because the emissions increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

- (a) New Source Performance Standards (NSPS):  
 There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (1) 40 CFR Part 63, Subpart PPPP – National Emission Standards for Surface Coating of Plastic Parts and Products  
Spray booth, identified as Plant 250 Touch-Up Repair Booth is subject to NESHAP 40 CFR Part 63, Subpart PPPP, as it will coat plastic parts and since it is located in a source that is major for HAPs. Since the source is an existing source, its compliance date for this NESHAP is April 19, 2007.

No detailed requirements from this rule will be included in this modification, except the notification.

- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

- (c) Compliance Assurance Monitoring (CAM) 40 CFR Part 64  
This rule applies to units at Part 70 source subject to emission limitations and using pollution control devices to comply with the limitations required under a NSPS, NESHAP, or State implementation plan (SIP) contained in 326 IAC, and the uncontrolled PTE of the controlled pollutant from the unit is at least 100% of the major source threshold.

Spray booth, identified as Plant 250 Touch-Up Repair Booth is not subject to CAM as it does not have an uncontrolled PTE of at least 100% of the major source threshold.

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

- (a) 326 IAC 2-3 (Emission Offset Requirements)  
The source is an existing major source under 326 IAC 2-3, Emissions Offset, as Elkhart County has been designated as nonattainment for 8-hour ozone and the source wide potential to emit VOC is greater than 100 tons per year.
- (b) 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 this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.

#### **State Rule Applicability - Individual Facilities**

- (a) 326 IAC 8 (Volatile Organic Sources)  
There are no specific rules in 326 IAC 8 that applies to the new Spray booth, identified as Plant 250 Touch-Up Repair Booth as it coats plastic parts used for RVs.
- (b) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state which are not otherwise regulated by other provisions in this article 326 IAC 8.

Spray booth, identified as Plant 250 Touch-Up Repair Booth is not subject to this rule as the VOC potential emission is less than 25 tons per year.

- (c) 326 IAC 6-3-2 and 40CFR 52 Subpart P (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the Spray booth, identified as Plant 250 Touch-Up Repair Booth shall be controlled by a dry filter; waterwash; or an equivalent control device and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
  - (2) Pursuant to 326 IAC 6-3 and 40 CFR 52 Subpart P the particulate matter (PM) from the proposed Spray booth, identified as Plant 250 Touch-Up Repair Booth shall be limited by the following:

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

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

## 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.

## Part 70 Permit Change

The Part 70 permit will be modified as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

- (a) *The following administrative amendment will be re-numbered for clarification purposes:*

First Administrative Amendment No.: 039-13811-00062, issued on March 21, 2001;  
Second Administrative Amendment No.: 039-17307-00062, issued on March 18, 2003;  
**Third** Administrative Amendment No.:039-15898-00062, issued on March 30, 2004; and  
**Fourth** Administrative Amendment No.: 039-19897-00062, issued on January 3, 2005.

- (b) *Section A.2 will be modified to include the new spray booth as item (i) as follows:*

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)3][326 IAC 2-7-5(15)]

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(a) through (h) no changes

(i) **One (1) spray booth, identified as Plant 250 Touch-Up Repair Booth, equipped with dry filters for particulate overspray control, exhausting to Stack S11, capacity: 0.75 recreational vehicles per hour.**

(c) *The NESHAP Notification requirements that will apply to the new Spray booth, identified as Plant 250 Touch-Up Repair Booth will be added in the Part 70 permit and be numbered as **Section D.6.***

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

(i) **One (1) spray booth, identified as Plant 250 Touch-Up Repair Booth, equipped with dry filters for particulate overspray control, exhausting to Stack S11, capacity: 0.75 recreational vehicles per hour.**

**(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 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to 40 CFR 52 Subpart P, the PM from the one (1) spray booth, identified as Plant 250 Touch-Up Repair Booth 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:

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

**D.6.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]**

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(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2004.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.6.5, Notification Requirements.

**D.6.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

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(a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April

19, 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, except as otherwise provided in this condition. The permit shield applies to Condition D.6.5, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 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 CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

#### Compliance Determination Requirements

##### D.6.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the spray booth, identified as Plant 250 Touch-Up Repair Booth shall be controlled by a dry filter; waterwash; or an equivalent control device and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

#### RECORD KEEPING AND REPORTING REQUIREMENTS

##### D.6.5 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

**D.6.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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**The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 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 Part 70 permit the applicable requirements of 40 CFR 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 the standard.**
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.**
- (c) The significant permit modification application shall be submitted to:  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed **Part 70 Minor Source Modification No. 039-20911-00062** and **Minor Permit Modification 039-20937-00062**.



**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** Coachmen Recreational Vehicle Co., LLC

**Address City IN Zip:** 423 N. Main St., Middlebury, IN 46540

**Permit Number:** 039-20911

**Plt ID:** 039-00062

**Permit Reviewer:** Aida De Guzman

**Date Application Received:** Mar. 7, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Metha.crylate	Weight % Cumene	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Cumene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
<b>Plant 250 Touch Up Booth</b>													
Base Coat	7.51	0.250000	0.75	16.00%	30.00%	1.00%	1.00%	3.00%	0.99	1.85	0.06	0.06	0.19
Flex Seal Sealer	9.33	0.125000	0.75	5.00%	7.00%	0.00%	1.00%	1.00%	0.19	0.27	0.00	0.04	0.04
Glamour Clear Coat	8.12	0.125000	0.75	1.00%	0.00%	0.00%	1.00%	1.00%	0.03	0.00	0.00	0.03	0.03

Total State Potential Emissions

<b>1.21</b>	<b>2.12</b>	<b>0.06</b>	<b>0.13</b>	<b>0.26</b>
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**METHODOLOGY**

Worst Single HAP

<b>2.12</b>
<b>3.78</b>

Combined HAPs

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs