



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: July 25, 2005
RE: Four Winds International / 039-21195-00220
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

July 25, 2005

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Mr. Larry White
Four Winds International
P.O. Box 1486
Elkhart, Indiana 46515

Re: 039-21195
Fourth Significant Revision to
FESOP 039-14036-00220

Dear Mr. White:

Four Winds International was issued a permit on January 7, 2003 for a motor home/recreational vehicle manufacturing source. A letter requesting changes to this permit was received on May 2, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The purpose of this review is to revise an existing emission limitation established pursuant to BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements). The VOC content limit is revised to include the use of touch-up paints for final finish operations with VOC content less than or equal to 6.05 pounds of VOC per gallon of coating as applied. There will be no net increase in the potential emission rate of the source with this revision and the source shall not exceed the overall source limit for VOC of 99.5 tons per consecutive twelve (12) month period.

Pursuant to 326 IAC 2-8-11.1, since the revision will involve a change in emission limitation that was established pursuant to the provisions of 326 IAC 8-1-6 this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gaurav Shil, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call at (973) 575-2555, ext. 3259 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments

GS/EVP

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling
IDEM Northern Regional Office



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Four Winds International, Inc.
701 County Road 15
Elkhart, Indiana 46515-1486**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-14036-00220	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 7, 2003 Expiration Date: January 7, 2008
First Significant Permit Revision No.: 039-16264-00220	Issuance Date: March 11, 2003
Second Significant Permit Revision No.: 039-19330-00220	Issuance Date: October 8, 2004
Third Significant Permit Revision No.: 039-20016-00220	Issuance Date: January 13, 2005
Fourth Significant Permit Revision No.: 039-21195-00220	Pages Affected: 5 and 31
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 25, 2005

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 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary motor home/recreational vehicle manufacturing source.

Authorized Individual:	President
Source Address:	701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:	P.O. Box 1486, Elkhart, Indiana 46515-1486
General Source Phone:	(574) 266-1111
SIC Code:	3716
County Location:	Elkhart
County Status:	Nonattainment for 8-hour ozone; and Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; and Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

Three (3) motor home product lines as follows:

- (a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:
 - (1) Sub-assembly area coating operations, identified as CSA-1, consisting of:
 - (A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray, and cup gun spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
 - (B) hand and aerosol application of miscellaneous solvents and cleaners.
 - (2) Final finish area coating operations, identified as CFF, consisting of:
 - (A) hand, aerosol, cup gun spray, and pressure pot spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and
 - (B) hand and aerosol application of miscellaneous solvents and cleaners

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]

The total combined VOC input usage to the Class C, Class A - Line 1, and Class A - Line 2 product lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents, minus used VOC in coating or cleanup solvents shipped off site, shall be limited to 99.5 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This usage limit is equivalent to 99.5 tons of VOC emitted per 12 consecutive month period.

Compliance with this limitation, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit of VOC to less than 100 tons per year and make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 and nonattainment new source review not applicable to the source.

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

Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), operation of facilities CSA-1, CFF, A1SA, A1FF, A2SA and A2FF without the use of add-on controls and with the following work practices will satisfy the BACT requirements:

- (a) When applying adhesives to plastic substrates, no coating shall be used with a VOC content of greater than 3.33 pounds of VOC per gallon of coating as applied.
- (b) When applying paints or primer coatings to plastic substrates, no coating shall be used with a VOC content of greater than 5.19 pounds of VOC per gallon of coating as applied, **except for the touch-up paints used for final finish operations which shall not have VOC content of greater than 6.05 pounds per gallon of coating as applied.**
- (c) All containers of solvents or solutions shall be kept closed when not in actual use except during product transfers to minimize evaporation.
- (d) All waste materials including spent wiping rags and spent solvents shall be stored in closed containers at all times except during product transfers to minimize solvent evaporation.
- (e) Unless prepackaged by the manufacturer and intended for use as an aerosol or atomized product, all solvents or solutions used shall be hand or manually applied. Hand or manual application shall include the use of cloths or wipes, including the use of handheld and hand actuated application spray bottles. No solvents or solutions shall be spray applied or applied in a manner that causes excessive atomization or promotes excessive evaporation.
- (f) Waste solvents or solutions shall not be disposed by allowing products to evaporate.
- (g) Solvent containing rags shall not be allowed to air dry to allow for reuse.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase actual VOC emissions for coating metals to greater than fifteen (15) pounds per day, before add-on controls, when coating metal parts at each of facilities CSA-1, CFF, CUA, A1SA, A1FF, A2SA and A2FF shall require OAQ's prior approval before such change can take place at any of these facilities.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Four Winds International, Inc.
Source Location:	701 CR 15, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	F039-14036-00220
Operating Permit Revision No.:	F039-21195-00220
Operation Permit Issuance Date:	January 7, 2003
Permit Reviewer:	Gaurav Shil / EVP

The Office of Air Quality (OAQ) has reviewed a revision application from Four Winds International, Inc. relating to revision of an emission limitation established pursuant to BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements).

Explanation of Revision Requested

On May 2, 2005 Four Winds International, Inc. (FWI) submitted an application to the OAQ requesting to revise an existing emission limitation established pursuant to BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements). OAQ approved a Significant Permit Revision on October 8, 2004 that established the VOC emission limitations for the application of adhesives and paints or primer coatings to plastic substrates.

The existing VOC content limit (5.19 pounds of VOC per gallon of coating as applied) was established since it was the highest VOC content material known to exist when the BACT analysis was performed and was lower than the lowest VOC content material (6.12 pounds of VOC per gallon of coating as applied) for the application of paints or primer coatings to plastic substrates at comparable sources. During a recent comprehensive review of raw materials the Permittee discovered that some paint formulations used for final finish operations exceeded the current VOC content limit in the permit. Since a small quantity of touch up paint (< 1 gallon in any consecutive 12 month period) was used the Permittee inadvertently excluded it from the previously approved BACT analysis.

Since the starting point for the cost effectiveness calculation is the uncontrolled VOC emission which is requested limit of 99.5 tpy, which will not be affected by the use of the touch up coating that exceeded the VOC content limit, the cost effectiveness for the selected control devices shall remain same as in previously approved economic analysis. Also, the total annualized costs for selected control devices at this time shall not change from the costs determined during previously issued BACT. Moreover, since the material is hand applied with a cotton swab during rarely performed final finish (blemish removal) operations, method substitution will not be necessary. Also, since the touchup paint must match the original color as supplied by the vendor and slight variations to that paint's color can occur even when the same paint formulation is remixed, the mixed color shall be used and the material substitution would be technically infeasible. The BACT emission limitation is revised to include the use of touch-up paints for final finish operations with VOC content less than or equal to 6.05 pounds of VOC per gallon of coating as applied. There will be no net increase in the potential emission rate of the source with this revision and the source shall not exceed the overall source limit for VOC of 99.5 tons per consecutive twelve (12) month

period.

Existing Approvals

The source was issued a FESOP Renewal No. F039-14036-00220 on January 7, 2003. The source has since received the following:

- (a) First Significant Permit Revision No. 039-16264, issued on March 11, 2003.
- (b) Second Significant Permit Revision No. 039-19330, issued on October 8, 2004.
- (c) Third Significant Permit Revision No. 039-20016, issued on January 13, 2005.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision 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 May 2, 2005 and additional information was received on May 11, 2005.

Potential To Emit for the Revision

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."

There is negligible change in uncontrolled potential to emit due to this revision.

Justification for Revision

The FESOP is being revised through a Significant Permit Revision based on the following:

- (a) This revision is being performed pursuant to 326 IAC 2-8-11.1 (f)(1)(C) since the revision will involve a change in emission limitation that was established pursuant to the provisions of 326 IAC 8-1-6.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2001 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants and the Toxic Release Report maintained by the IDEM Office of Pollution Prevention and Technical Assistance.

Pollutant	Emissions (ton/yr)
PM	7.04
PM10	7.04
SO ₂	0.01
VOC	35.62
CO	0.18
NO _x	0.9
single HAP	3.0
total HAPs	3.0

Existing Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	19.9
PM10	20.6
SO ₂	0.1
VOC	< 100
CO	8.1
NO _x	13.7
single HAP	<10
total HAPs	<25

- (a) This existing source is not a major stationary source for PSD review because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) This existing source is not a major stationary source under Emission Offset, 326 IAC 2-3 because Elkhart County was designated as non-attainment for the 8-hour ozone standard on June 15, 2004 and VOC is emitted at a rate less than 100 tons per year.
- (b) These emissions are based upon FESOP Renewal No. F039-14036-00220, issued on January 7, 2003.

Potential to Emit After Issuance

The source, issued FESOP Renewal No. F039-14036-00220 on January 7, 2003, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (PTE) After Issuance (tons/year) ⁽¹⁾						
	PM	PM ₁₀	SO ₂	VOC	CO	NOx	HAPs
Class A - Line 1; Class A - Line 2; and Class C coating operations (Sub-assembly & Final Finish)	2.26	2.26	0.00	<99.2 ⁽²⁾	0.00	0.00	<10 (single) <25 (total)
Class A Lines 1 & 2 steel & aluminum tube welding ⁽³⁾	2.41	2.41	0.00	0.00	0.00	0.00	
Class C Line 2 steel & aluminum tube welding ⁽³⁾	2.41	2.41	0.00	0.00	0.00	0.00	
Natural gas combustion as an insignificant activity	0.39	1.13	0.06	0.80	9.66	15.50	
Class A Lines 1 & 2 subassembly ⁽³⁾ & final finish woodworking and machining operations	27.23	27.23	0.00	0.00	0.00	0.00	
Class C subassembly & final ⁽³⁾ finish woodworking operations	13.23	13.23	0.00	0.00	0.00	0.00	
Total PTE for Source after Issuance	61.97	62.71	0.06	< 100	9.66	15.50	<10 (single) <25 (total)
PSD Threshold Level	250	250	250	250	250	250	N/A
Emission Offset Threshold Level	N/A	N/A	N/A	100	N/A	100	N/A
Part 70 Threshold Level	100	100	100	100	100	100	10 (single) 25 (total)

Notes:

- (1) There is negligible change in potential to emit due to this revision. Hence, the potential to emit after issuance remains same as last approval for the source.
- (2) Reflects revised source-wide VOC emission limitation taken from Condition D.1.1 of FESOP Renewal No. F039-14036-00220, issued on January 7, 2003.
- (3) Reflects 326 IAC 6-3-2(e) allowable emission rate (lb/hr) extrapolated on an equivalent annual basis assuming 8,760 hours of operation.

- (a) This modification to an existing minor stationary source is not major because there is no emission increase from the revision. Therefore, pursuant to 326 IAC 2-2 PSD requirements do not apply.
- (b) This modification to an existing minor stationary source is not major because there is no emission increase from the revision. Therefore, pursuant to 326 IAC 2-3 Emissions Offset requirements do not apply.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	Attainment or Unclassifiable
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hr Ozone	Attainment
8-hr Ozone	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 nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emissions Offset, 326 IAC 2-3 review.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.
- (c) Elkhart County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit as a result of this revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit as a result of this revision.

State Rule Applicability

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per

year or more, and which are not otherwise regulated by another provision of Article 8. Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) issued on October 8, 2004, VOC content limitations were established for the application of adhesives (3.33 pounds of VOC per gallon of coating as applied) and paints/primer coatings (5.19 pounds of VOC per gallon of coating as applied) to plastic substrates and best management practices for solvent wiping operations were determined to be BACT for the modification.

During recent source wide physical inspections, the Permittee performed a comprehensive review of the raw materials used at the source. This included obtaining material safety data sheets (MSDS) and formulation data for the paints used by each of the Permittee's vendors. Based on the review, the Permittee determined that one of the coating materials did not meet the VOC content limit of 5.19 pounds VOC per gallon of coating as applied. The highest VOC content material from all of the paint formulations used by the vendors used by the Permittee is 6.05 pounds of VOC per gallon of coating.

The final finish operations are performed at the source after the surface coating of recreation vehicles at an outside vendor site. If the vehicle's paint surface becomes slightly blemished, the Permittee applies spot of paint on the blemish using cotton swab to correct the problem. The material is not thinned with solvent prior to the application with a cotton swab at the source. Significant "repainting" is not performed at the source. The Permittee estimates that less than one (1) gallon of material is consumed per any consecutive twelve (12) month period from the touchup operations. Because of the small quantity of paint used and because the paint is not listed on any vendor purchase reports, it was inadvertently excluded from the BACT analysis.

The existing VOC content limit (5.19 pounds of VOC per gallon of coating as applied) was established since it was the highest VOC content material known to exist when the BACT analysis was performed and was lower than the lowest VOC content material (6.12 pounds of VOC per gallon of coating as applied) for the application of paints or primer coatings to plastic substrates at comparable sources. If the touchup paint had been included in the BACT analysis then the VOC content limit would have been set at 6.05 pounds of VOC per gallon of coating as applied.

The total annualized costs for selected control devices at this time shall not change from the costs determined during previously issued BACT. Since the starting point for the cost effectiveness calculation is the uncontrolled VOC emissions which is requested limit of 99.5 tpy, which will not be affected by the use of the touch up coating that exceeded the VOC content limit, the cost effectiveness for the selected control devices shall remain same as in previously approved economic analysis. Moreover, since the material is hand applied with a cotton swab during rarely performed final finish (blemish removal) operations method substitution will not be necessary. Also, since the touchup paint must match the original color as supplied by the vendor and slight variations to that paint's color can occur even when the same paint formulation is remixed, the mixed color shall be used and the material substitution would be technically infeasible. Therefore, the VOC content limit established pursuant to BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) is revised.

Testing Requirements

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the woodworking operations are controlled by baghouse and, along with other processes, have emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 in 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.

There are no new compliance monitoring requirements applicable to this source revision.

Changes to the Federally Enforceable State Operating Permit (FESOP) due to this Revision:

The following changes are made as the fourth Significant Permit Revision to FESOP Renewal No. 039-14036-00220 (new language is shown in **bold** and deleted language is shown with a ~~line through it~~):

1. The 8 hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore provisions of 326 IAC 2-3 are applicable in these areas. IDEM has deleted the Nonattainment NSR term from Section A.1 permit and replaced it with appropriate term in 326 IAC 2-3 as Emissions Offset as follows. IDEM has also specified in Section A.1 that the source is not major for PSD review:

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary motor home/recreational vehicle manufacturing source.

Authorized Individual:	President
Source Address:	701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:	P.O. Box 1486, Elkhart, Indiana 46515-1486
General Source Phone:	(574) 266-1111
SIC Code:	3716
County Location:	Elkhart
County Status:	Nonattainment for 8-hour ozone; and Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under nonattainment NSR Rules under PSD and Emission Offset Rules ; and Minor Source, Section 112 of the Clean Air Act

2. The VOC content limit of paints or primer coatings when applied to plastic substrates is revised from 5.19 pounds of VOC per gallon of coating to 6.05 pounds of VOC per gallon of coating in Condition D.1.2 (b):

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), operation of facilities CSA-1, CFF, A1SA, A1FF, A2SA and A2FF without the use of add-on controls and with the following work practices will satisfy the BACT requirements:

- (a) When applying adhesives to plastic substrates, no coating shall be used with a VOC content of greater than 3.33 pounds of VOC per gallon of coating as applied.
- (b) When applying paints or primer coatings to plastic substrates, no coating shall be used with a VOC content of greater than 5.19 pounds of VOC per gallon of coating as applied, **except for the touch-up paints used for final finish operations which shall not have VOC content of greater than 6.05 pounds per gallon of coating as applied.**
- (c) All containers of solvents or solutions shall be kept closed when not in actual use except during product transfers to minimize evaporation.
- (d) All waste materials including spent wiping rags and spent solvents shall be stored in closed containers at all times except during product transfers to minimize solvent evaporation.
- (e) Unless prepackaged by the manufacturer and intended for use as an aerosol or atomized product, all solvents or solutions used shall be hand or manually applied. Hand or manual application shall include the use of cloths or wipes, including the use of handheld and hand actuated application spray bottles. No solvents or solutions shall be spray applied or applied in a manner that causes excessive atomization or promotes excessive evaporation.
- (f) Waste solvents or solutions shall not be disposed by allowing products to evaporate.
- (g) Solvent containing rags shall not be allowed to air dry to allow for reuse.

Conclusion

The operation of this motor home/recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Significant Permit Revision No. 039-21195-00220.