



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: February 15, 2006  
RE: Gulf Stream Coach / 085-21804-00105  
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, 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 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, 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 impracticable 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.



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# NEW SOURCE CONSTRUCTION AND PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Gulf Stream Coach, Inc.  
9876 West Old Road 30  
Etna Green, Indiana 46524**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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

Operation Permit No.: T085-21804-00105	
Original signed by:  Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 15, 2006  Expiration Date: February 15, 2011

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

Responsible Official:	President
Source Address:	9876 West Old Road 30, Etna Green, Indiana 46524
Mailing Address:	P.O. Box 105, Nappanee, Indiana 46550
General Source Phone Number:	(574) 773-7941
SIC Code:	3792
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Minor 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)]

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This travel trailer assembly company consists of two (2) plants:

- (a) Plant ID #085-00101 is located at 330 North Tower Street, Etna Green, Indiana 46524; and
- (b) Plant ID #085-00105 is located at 9876 West Old Road 30, Etna Green, Indiana 46524.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control by the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit. Separate Part 70 permits will be issued to Plant #085-00101 and #085-00105 solely for administrative purposes.

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

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

- (a) One (1) floor assembly area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied to wood and plastic substrate, using brushes, spray foam, and extruders, with emissions exhausting to the general ventilation V1.
- (b) One (1) shelling area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to plastic and wood substrates, with emissions exhausting to the general ventilation V1.
- (c) One (1) roofing area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V1.
- (d) One (1) woodworking area, constructed in 2005, with a maximum throughput rate of 16,592 pounds of wood per hour, controlled by baghouses BH1 through BH4 which vent inside the building, consisting of the following:

- (1) Four (4) table saws.
- (2) Four (4) radial arm saws.
- (3) Six (6) chop saws.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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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]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

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- (a) This permit, T085-21804-00105, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-7-7]**

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

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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)]**

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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)]**

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- (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. One (1) certification may cover multiple forms in one (1) submittal.
- (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 July 1 of each year to:

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

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]**

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- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit for the sources as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) 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 PMPs do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (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 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;

IDEM:

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Northern Regional Office:

Telephone No.: 1-800-753-5519, or  
Telephone No.: 219-245-4870  
Facsimile No.: 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 46204-2251

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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, 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][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T085-21804-00105 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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

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- (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 46204-2251

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.16 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]

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- (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.17 Permit Renewal** [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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- (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 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (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 46204-2251

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

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- (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.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (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 limitations provided in 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 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make 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 emissions increases and decreases at 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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 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.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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.23 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 46204-2251  
  
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.24 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, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 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 [326 IAC 6-3-2]**

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

**C.2 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.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

All required notifications shall be submitted to:

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

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

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

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

### C.8 Performance Testing [326 IAC 3-6]

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- (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 46204-2251

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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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 46204-2251

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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

C.15 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.16 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (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 46204-2251

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

- (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.17 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.18 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 46204-2251

- (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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) floor assembly area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied to wood and plastic substrate, using brushes, spray foam, and extruders, with emissions exhausting to the general ventilation V1.
- (b) One (1) shelling area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to plastic and wood substrates, with emissions exhausting to the general ventilation V1.
- (c) One (1) roofing area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V1.

(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 Volatile Organic Compounds [326 IAC 8-2-9]

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three (3.0) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.2 HAP Emissions [326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-4.1 (MACT) not applicable, the Permittee shall comply with the following:

- (a) The amount of any single HAP used in the surface coating operations at both Plant #085-00101 and Plant #085-00105 shall not exceed a total of 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of total HAP used in the surface coating operations at both Plant #085-00101 and Plant #00105 shall not exceed a total of 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

### Compliance Determination Requirements

#### D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and HAP usage limitations contained in Conditions D.1.1 and

D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

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

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and HAP usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP contents of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a 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 cleanup solvent usage for each month.
  - (4) The total HAP usage for each month.
  - (5) The total HAP usage for each compliance period.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of the permit.

#### **D.1.5 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, 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)]:

- (d) One (1) woodworking area, constructed in 2005, with a maximum throughput rate of 16,592 pounds of wood per hour, controlled by baghouses BH1 through BH4 which vent inside the building, consisting of the following:
- (1) Four (4) table saws.
  - (2) Four (4) radial arm saws.
  - (3) Six (6) chop saws.

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

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

#### D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM/PM10 emissions from each of the baghouses BH1 through BH4, which are used to control the emissions from the woodworking area, shall not exceed 0.2 lbs/hr.

Combined with the PM/PM10 emissions from the surface coating operating in the shelling area, the insignificant activities, and the PM/PM10 emissions from Plant #085-00101, the PM/PM10 emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

#### D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking area shall not exceed 16.9 pounds per hour when operating at a process weight rate of 16,592 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for particulate control shall be in operation and control emissions from the woodworking area at all times that the woodworking equipment is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.

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

#### **D.2.4 Visible Emissions Notations**

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- (a) Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.2.5 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### **D.2.6 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

**D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts when venting to the atmosphere.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Gulf Stream Coach, Inc.  
Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
Part 70 Permit No.: T085-21804-00105

**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 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Gulf Stream Coach, Inc.  
Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
Part 70 Permit No.: T085-21804-00105

**This form consists of 2 pages**

**Page 1 of 2**

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | This is an emergency as defined in 326 IAC 2-7-1(12)   |
| X                        | 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                    |
| X                        | 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
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Gulf Stream Coach, Inc.  
 Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
 Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
 Part 70 Permit No.: T085-21804-00105  
 Facility: Surface Coating Operations at Plant #085-00101 and Plant #085-00105  
 Parameter: A Single HAP Usage  
 Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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: Gulf Stream Coach, Inc.  
Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
Part 70 Permit No.: T085-21804-00105  
Facility: Surface Coating Operations at Plant #085-00101 and Plant #085-00105  
Parameter: Total HAP Usage  
Limit: Less than 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Gulf Stream Coach, Inc.  
 Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
 Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
 Part 70 Permit No.: T085-21804-00105

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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 (TSD) for a New Source Construction and a Part 70 Operating Permit

### Source Background and Description

Source Name:	Gulf Stream Coach, Inc.
Source Location:	9876 West Old Road 30, Etna Green, Indiana 46524
County:	Kosciusko
SIC Code:	3792
Operation Permit No.:	T085-21804-00105
Permit Reviewer:	ERG/YC

On November 18, 2005, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Gulf Stream Coach, Inc. had applied for a New Source Construction and a Part 70 operating permit to construct and operate a travel trailer assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 13, 2005, Gulf Stream Coach, Inc. submitted comments on the proposed Part 70 operating permit. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

#### Comment 1:

The Permittee stated the requirements in Condition D.1.1 do not apply to the surface coating operations at this plant because they will not coat wood furniture or cabinets at this plant. The Permittee stated that the parts received at the floor assembly and the shelling areas are pre-coated and they will only apply water-based adhesive to the wooden structure of the travel trailers. The Permittee also requested to revise the recordkeeping frequency for coating usage from daily to monthly.

#### Response to Comment 1:

Since this source will not apply coatings to wood furniture or cabinets and the potential to emit VOC of the floor assembly area and the shelling area is less than 15 pounds per day, the surface coating operations at the floor assembly area and the shelling area are not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Upon further review, IDEM has determined that Condition D.1.1, which limits the VOC usage at each coating operation to less than 15 pounds per day, is not necessary. Therefore, Condition D.1.1 and the corresponding recordkeeping requirements have been removed. The monthly recordkeeping requirement included in Condition D.1.5(a) (now D.1.4(a)) is sufficient to demonstrate compliance with the HAP usage limit in Condition D.1.3 (now D.1.2). Therefore, the following conditions in Section D.1 have been revised as follows:

~~D.1.1~~ VOC [326 IAC 8-2-12]

---

~~In order to render the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) not applicable, the VOC usage for the wood surface coating operations at each of the the floor assembly area and the shelling area shall be less than 15 lbs/day.~~

D.1.23 HAP Emissions [326 IAC 2-4.1]

---

D.1.34 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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Compliance with the VOC content ~~and VOC and HAP usage~~ limitations contained in Conditions D.1.1 ~~and D.1.2 through D.1.3~~ 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 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.

D.1.45 Record Keeping Requirements

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(a) To document compliance with Conditions D.1.1 ~~and D.1.2 through D.1.3~~, the Permittee shall maintain records in accordance with (1) through (56) below. Records maintained for (1) through (56) shall be taken ~~monthly~~ **daily** and shall be complete and sufficient to establish compliance with the VOC content and ~~VOC and HAP usage~~ limits established in Conditions D.1.1 ~~and D.1.2 through D.1.3~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC and HAP contents of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a ~~monthly~~ **daily** 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 volume weighted VOC content of the coatings used for each day.~~

~~(34) The cleanup solvent usage for each month~~ **day**.

~~(5) The total VOC usage for each day.~~

~~(46) The total HAP usage for each month.~~

**(5) The total HAP usage for each compliance period.**

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

D.1.56 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.23 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, 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).

Upon further review, has decided to make the following revisions to the permit:

1. The units listed on the quarterly report forms have been corrected as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Gulf Stream Coach, Inc.  
Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
Part 70 Permit No.: T085-21804-00105  
Facility: Surface Coating Operations at Plant #085-00101 and Plant #085-00105  
Parameter: A Single HAP Usage  
Limit: Less than 10 ~~tons~~ ~~hours~~ per twelve (12) consecutive month period with compliance determined at the end of each month.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Gulf Stream Coach, Inc.  
Source Address: 9876 West Old Road 30, Etna Green, Indiana 46524  
Mailing Address: P.O. Box 105, Nappanee, Indiana 46550  
Part 70 Permit No.: T085-21804-00105  
Facility: Surface Coating Operations at Plant #085-00101 and Plant #085-00105  
Parameter: Total HAP Usage  
Limit: Less than 24.0 ~~tons~~ ~~hours~~ per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Technical Support Document (TSD) for a  
New Source Construction and a Part 70 Operating Permit

**Source Background and Description**

Source Name:	Gulf Stream Coach, Inc.
Source Location:	9876 West Old Road 30, Etna Green, Indiana 46524
County:	Kosciusko
SIC Code:	3792
Operation Permit No.:	T085-21804-00105
Permit Reviewer:	ERG/YC

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

**Source Definition**

Gulf Stream Coach, Inc. owns the following two (2) travel trailer assembly plants in Etna Green, Indiana:

- (a) The existing plant (Plant ID #085-00101) is located at 330 North Tower Street, Etna Green, Indiana 46524; and
- (b) The proposed new plant (Plant ID #085-00105) will be located at 9876 West Old Road 30, Etna Green, Indiana 46524.

Since the two (2) plants are owned by one (1) company, have the same SIC code (SIC: 3792), and are located in contiguous properties (0.6 mile apart), IDEM, OAQ has determined that these two (2) plants will be considered one (1) single source. Separate Part 70 permits will be issued to Plant #085-00101 and #085-00105 solely for administrative purposes.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control equipment which are located in the existing plant #085-00101:

- (a) One (1) travel trailer assembly and finishing operation, constructed in 2005, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components at a maximum throughput of 1.25 trailers per hour, venting to the indoors.
- (b) One (1) woodworking operation, constructed in 2005, consisting of cutting and sawing of wood, with particulate emissions controlled by one (1) baghouse, with an internal return air system, and a control efficiency of 99%. The woodworking operation consists of the following emission units:
  - (1) Two (2) table saws for cutting of wood.
  - (2) One (1) radial arm saw for cutting of wood.
  - (3) Three (3) chop saws for cutting of wood.

- (c) Five (5) natural gas-fired Thermo-cycler heaters, each with a maximum heat input capacity of 0.7 MMBtu/hr.
- (d) One (1) natural gas-fired office heater, with a maximum heat input capacity of 0.109 MMBtu/hr.

Note that the source submitted an application received on October 19, 2005, to increase the production of the existing plant #085-00101 from 1.25 units per hour to 8.3 units per hour.

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

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

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

The source consists of the following emission units and pollution control equipment:

- (a) One (1) floor assembly area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied to wood and plastic substrate, using brushes, spray foam, and extruder, with emissions exhausting to the general ventilation V1.
- (b) One (1) shelling area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to plastic and wood substrates, with emissions exhausting to the general ventilation V1.
- (c) One (1) roofing area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied by paint rollers and extruders to wood, rubber, and metal substrate, with emissions exhausting to the general ventilation V1.
- (d) One (1) woodworking area, constructed in 2005, with a maximum throughput rate of 16,592 pounds of wood per hour, controlled by baghouses BH1 through BH4 which vent inside the building, consisting of the following:
  - (1) Four (4) table saws.
  - (2) Four (4) radial arm saws.
  - (3) Six (6) chop saws.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including five (5) natural gas fired heaters, constructed in 2005, identified as H-1 through H-5, each with a maximum heat input capacity of 0.58 MMBtu/hr.
- (b) A petroleum fuel (other than gasoline) dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month, including one (1) fuel oil storage tank for fork lifts, constructed in 2005, with a maximum capacity of 300 gallons.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including one (1) stick welding station in chassis preparation area, constructed in 2005, with a maximum capacity of 0.25 pounds per hour.
- (d) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less

than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

- (1) One (1) chassis preparation area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, including frame wiring and axle mounting steps, with emissions exhausting to the general ventilation V1.
- (2) One (1) final finish area, constructed in 2005, with a maximum throughput rate of 8.0 RVs per hour, with materials applied to carpet, wood, plastic, and metal substrates using aerosol cans, with emissions exhausting to the general ventilation V1.

### **Existing Approvals**

The source has constructed or has been operating under the following previous approvals:

Registration #085-20939-00101, issued on March 23, 2005, for plant #085-00101.

Terms and conditions in the above approval will not be included in this Part 70 permit because separate Part 70 permits will be issued to Plant #085-00101 and #085-00105 solely for administrative purposes.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Permit 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 September 27, 2005. Additional information was received on October 5, 2005, October 17, 2005, November 3, 2005, and November 10, 2005.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

### **Potential to Emit of the Source Before Controls**

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

Pollutant	Potential to Emit for Plant #085-00105 (tons/yr)	Potential to Emit for Plant #085-00101* (tons/yr)	Potential to Emit for the Entire Source (tons/yr)
PM	Greater than 250	4.56	Greater than 250
PM10	Greater than 250	4.56	Greater than 250
SO <sub>2</sub>	0.01	Negligible	0.01
VOC	64.5	20.1	84.6
CO	1.07	1.33	2.40
NO <sub>x</sub>	1.27	1.58	2.85

HAPs	Potential to Emit for Plant #085-00105 (tons/yr)	Potential to Emit for Plant #085-00101* (tons/yr)	Potential to Emit for the Entire Source (tons/yr)
MEK	17.0	2.71	19.7
Other HAPs	Negligible	0.47	0.47
Total	17.0	3.18	20.2

\*Note: The PTE for Plant #085-00101 is from the TSD for 085-20939-00101, issued on March 23, 2005.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will accept HAP usage limits to limit the HAP emissions from the entire source to below the major source thresholds for HAPs.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### County Attainment Status

The source is located in Kosciusko County.

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

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

- (c) Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Source Status

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

Pollutant	Potential to Emit for Plant #085-00105 (tons/yr)	Potential to Emit for Plant #085-00101* (tons/yr)	Potential to Emit for the Entire Source (tons/yr)
PM	Less than 3.65	4.56	Less than 8.21
PM-10	Less than 3.65	4.56	Less than 8.21
SO <sub>2</sub>	0.01	Negligible	0.01
VOC	49.0	20.1	69.1
CO	1.07	1.33	2.40
NO <sub>x</sub>	1.27	1.58	2.85

\*Note: The PTE for Plant #085-00101 is from the TSD for #085-20939-00101, issued on March 23, 2005.

- (a) This existing source is not a PSD major stationary source because no regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) These emissions were based on the potential to emit calculations for Plant #085-00105 (See Appendix A) and the PTE calculations in the TSD for permit #085-20939-00101, issued on March 23, 2005.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

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

- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.
- (f) This existing source will comply with the HAP usage limits to limit the total HAP emissions from the entire source (including Plants # 085-00105 and #085-00101) to less than the major source thresholds. Therefore, this source is not a major source of HAPs and the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) are not included in this permit.
- (g) This existing source is not a major source of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ) are not included in this permit.
- (h) This existing source is not a major source of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (40 CFR 63.4480 - 63.4581, Subpart PPPP) are not included in this permit.
- (i) This Part 70 permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
  - (1) with the potential to emit before controls equal to or greater than the major source thresholds;
  - (2) that is subject to an emission limitation or standard; and
  - (3) uses a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM) are not included in this permit.

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

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

The source was constructed and modified in 2005. The source is not in 1 of 28 source categories as defined in 326 IAC 2-2-1 and the potential to emit PM and PM10 from the entire source before control is greater than 250 tons/yr.

In order to render the requirement of 326 IAC 2-2 (PSD) not applicable, the PM/PM10 emissions from each of the baghouses BH1 through BH4, which will be used to control the emissions from the woodworking area, shall not exceed 0.2 lbs/hr. This is equivalent to a total of 3.50 tons/yr of PM/PM10 emissions.

As shown in Appendix A, the use of baghouses in the woodworking area is necessary to ensure compliance with the emission limits above. Combined with the PM/PM10 emissions from the surface coating operations in the shelling area, the insignificant activities, and the PM/PM10 emissions from Plant #085-00101, the PM/PM10 emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

The new production line to be constructed at 9876 West Old Road 30 will be constructed after July 27, 1997 and has a potential to emit HAPs greater than 10 tons/yr for a single HAP. However, the source has elected to comply with the following limitations:

- (a) The amount of any single HAP used in the surface coating operations at both Plant #085-00101 and Plant #085-00105 shall not exceed a total of 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total amount of HAP used in the surface coating operations at both Plant #085-00101 and Plant #085-00105 shall not exceed a total of 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County and is required to have an operating permit under 326 IAC 2-7. Since the potential to emit PM10 of this source is limited to less than 250 tons/yr, pursuant to 326 IAC 2-6-3(b)(1), the Permittee shall submit an emission statement triennially. The first report is due no later than July 1, 2007 and subsequent reports are due every three (3) years thereafter.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

### **State Rule Applicability - Coating Operations**

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

The surface coating operations in the floor assembly area, the shelling area, and the rubber roofing area apply adhesives to wood substrates. However, the actual VOC emissions from each of the surface coating operations for wood substrates at these areas are less than 15 lbs/day. Therefore, the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable to these coating operations. Any changes that would increase the actual VOC emissions from these facilities would require prior approval by IDEM, OAQ.

Pursuant to 326 IAC 8-1-1(c), the Permittee shall maintain, at minimum, daily consumption records, certification of VOC emission rates, and daily calculations of VOC emissions for the wood cabinet and furniture coating operations at the floor assembly area and the shelling area. Note that the surface coating operations at the rubber roofing area do not apply coatings to wood cabinets or furniture.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The metal coating operation in the rubber roofing area will be constructed after July 1, 1990 and will have actual VOC emissions greater than 15 pounds per day. Therefore, the VOC content of the coatings which are applied to metal substrates in the rubber roofing area shall be limited as follows:

- (a) Three (3.0) pounds VOC per gallon of coating, excluding water, delivered to the coating applicators.
- (b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

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

- (a) The potential VOC emissions from the rubber roofing area are greater than 25 tons/yr. However, the coating operations at the rubber roofing area apply coatings to wood, rubber, and metal substrates. The application of coatings to metal substrates is subject to another Article 8 rule (326 IAC 8-2-9 - Miscellaneous Metal Coating Operations). The potential VOC emissions from the application of coatings to wood and rubber substrates are less than 25 tons per year. Therefore, the coating operations in the rubber roofing area are not subject to the requirements of 326 IAC 8-1-6 (BACT).
- (b) The potential VOC emissions from each of the surface coating operations in the floor assembly area and the shelling area are less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

Pursuant to 326 IAC 6-3-1(b), surface coating operations using flow coating, brush coating, and aerosol coating products are exempt from the requirements of 326 IAC 6-3. Therefore, the surface coating operations in the floor assembly, the shelling area, and the rubber roofing areas are exempt from the requirements of 326 IAC 6-3.

**State Rule Applicability – Woodworking Area**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

The allowable particulate emissions from the woodworking area shall be limited to 16.9 lbs/hr when operating at the process weight rate of 16,592 lbs/hr.

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

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

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

As shown in Appendix A, the potential to emit particulate from this woodworking area after control is less than the emission limit above. The use of baghouse BH1 through BH4 is necessary to comply with this limit.

**State Rule Applicability – Natural Gas Fired Heating Units (Insignificant)**

There are no specifically applicable requirements for these units.

**State Rule Applicability – Storage Tank (Insignificant)**

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

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

**326 IAC 12 (NSPS Requirements)**

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

**State Rule Applicability – Welding Operation (Insignificant)**

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

The welding operation at this source consumes less than 625 pounds of rod or wire per day. Therefore, the welding equipment at this source is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(9).

### **State Rule Applicability – Final Finish Area (Insignificant)**

#### **326 IAC 8-2 (Surface Coating Emission Limitations)**

The actual VOC emissions from the final finish area will be less than 15 lbs/day. Therefore, the requirements of 326 IAC 8-2 (Surface Coating Emission Limitations) are not applicable. Any changes that would increase the actual VOC emissions to greater than 15 lbs/day requires prior approval from IDEM, OAQ.

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

The potential VOC emissions from the final finish area are less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 are not applicable. Any changes that would increase the actual VOC emissions to greater than 25 tons per year would require prior approval from IDEM, OAQ.

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

Pursuant to 326 IAC 6-3-1(b)(12), surface coating operations using aerosol coating products are exempt from the requirements of 326 IAC 6-3. Therefore, particulate emissions from the final finish area are exempt from the requirements of 326 IAC 6-3.

### **Testing Requirements**

The use of baghouses BH1 through BH4 for the woodworking area is necessary to comply with the PM/PM10 emission limitations. Since all of the baghouses will vent indoors, no stack testing is required for the baghouses controlling the woodworking operations.

### **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. 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The baghouses BH1 through BH4, which are used to control the emissions from the woodworking area, have applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the baghouse stack exhausts shall be performed daily during normal daylight operations when venting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously anormal@ means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that

specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking area when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
  - (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
  - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouses used to control particulate emissions from the woodworking area must operate properly to ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

## **Conclusion**

The construction and operation of this travel trailer assembly plant shall be subject to the conditions of the Part 70 Operating Permit #085-21804-00105.

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

**Company Name: Gulf Stream Coach**

**Address : 9876 West Old Road 30, Etna Green, IN 46524**

**Title V: 085-21804-00105**

**Reviewer: ERG/YC**

**Date: November 10, 2005**

Material	Substrate	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 before Control* (lbs/hr)	PTE of PM/PM10 before Control* (tons/yr)	Application Methods	Transfer Efficiency** (%)
<b>Floor Assembly</b>															
ABS Black Cement	Plastic	6.66	75.0%	0.00%	75.0%	8.00	0.089	5.00	3.56	85.4	15.6	0.00	0.00	Brush	100%
ABS Cleaner	Plastic	6.75	100%	0.00%	100%	8.00	0.012	6.75	0.65	15.6	2.84	0.00	0.00	Brush	100%
Enerfoam 43	Wood	10.0	0.00%	0.00%	0.00%	8.00	0.002	0.00	0.00	0.00	0.00	0.00	0.00	Spray Foam	100%
Wood Glue xb-2906	Wood	9.60	64.0%	59.0%	5.00%	8.00	0.089	0.48	0.34	8.20	1.50	0.00	0.00	Extruded	100%
<b>Shelling</b>															
502 Silicone	Fiberglass/Plastic	8.59	0.00%	0.00%	0.00%	8.00	0.690	0.00	0.00	0.00	0.00	0.00	0.00	Caulk Tube	100%
DC 13237 Adhesive	Insulation/Wood	8.37	46.3%	46.2%	0.12%	8.00	0.250	0.01	0.02	0.48	0.09	0.00	0.00	Rolled	100%
<b>Rubber Roofing</b>															
8011 Adhesive	Wood/Rubber	8.34	42.0%	42.0%	0.00%	8.00	0.230	0.00	0.00	0.00	0.00	0.00	0.00	Rolled	100%
1021 Self Leveling Sealant	Metal	11.35	34.0%	12.00%	22.0%	8.00	0.500	2.50	9.99	240	43.7	0.00	0.00	Extruded	100%
<b>Final Finish (insignificant)</b>															
Spot Beater	Carpet	8.13	89.0%	64.0%	25.0%	8.00	0.006	2.03	0.10	2.34	0.43	2.15E-03	0.01	Aeresol Cans	95%
Insta Buff	Everything	8.04	74.0%	56.0%	18.0%	8.00	0.006	1.45	0.07	1.67	0.30	5.02E-03	0.02	Aeresol Cans	95%
<b>Total</b>											<b>64.5</b>		<b>0.03</b>		

\* Assume all the PM emissions are PM10.

**METHODOLOGY**

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

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

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

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

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

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

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

**Company Name: Gulf Stream Coach**

**Address : 9876 West Old Road 30, Etna Green, IN 46524**

**Title V: 085-21804-00105**

**Reviewer: ERG/YC**

**Date: November 10, 2005**

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % MEK	PTE of MEK (tons/yr)
<b>Floor Assembly</b>					
ABS Black Cement	6.66	8.00	0.089	68%	14.1
ABS Cleaner	6.75	8.00	0.012	100%	2.84
Enerfoam 43	10.0	8.00	0.002	0%	0.00
Wood Glue xb-2906	9.60	8.00	0.089	0%	0.00
<b>Shelling</b>					
502 Silicone	8.59	8.00	0.690	0%	0.00
DC 13237 Adhesive	8.37	8.00	0.250	0%	0.00
<b>Rubber Roofing</b>					
8011 Adhesive	8.34	8.00	0.230	0%	0.00
1021 Self Leveling Sealant	9.10	8.00	0.500	0%	0.00
<b>Final Finish (insignificant)</b>					
Spot Beater	8.13	8.00	0.006	0%	0.00
Insta Buff	8.04	8.00	0.006	0%	0.00
<b>Total</b>					<b>17.0</b>

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
PM10 and PM10 Emissions  
From Woodworking Operations**

**Company Name: Gulf Stream Coach  
Address : 9876 West Old Road 30, Etna Green, IN 46524  
Title V: 085-21804-00105  
Reviewer: ERG/YC  
Date: November 10, 2005**

Control Device ID	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)
BH1	Baghouse	0.02	1,100	0.19	0.83	99%	18.9	82.6
BH2	Baghouse	0.02	1,100	0.19	0.83	99%	18.9	82.6
BH3	Baghouse	0.02	700	0.12	0.53	99%	12.0	52.6
BH4	Baghouse	0.02	700	0.12	0.53	99%	12.0	52.6
<b>Total</b>				<b>0.62</b>	<b>2.70</b>		<b>61.7</b>	<b>270</b>

Assume all PM emissions equal PM10.

**Methodology**

PTE of PM/PM10 after Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM10 after Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM10 before Control = PTE of PM/PM10 after Control / (1-Control Efficiency)

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Natural Gas Combustion Units**

**Company Name: Gulf Stream Coach  
Address : 9876 West Old Road 30, Etna Green, IN 46524  
Title V: 085-21804-00105  
Reviewer: ERG/YC  
Date: November 10, 2005**

Heat Input Capacity  
MMBtu/hr

**2.90** (5 units combined)

Potential Throughput  
MMSCF/yr

25.4

	Pollutant					
Emission Factor in lbs/MMSCF	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.10</b>	<b>0.10</b>	<b>7.6E-03</b>	<b>1.27</b>	<b>0.07</b>	<b>1.07</b>

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

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

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

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMSCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,000 MMBtu  
Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lbs/MMSCF) x 1 ton/2,000 lbs

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

**Company Name: Gulf Stream Coach  
Address : 9876 West Old Road 30, Etna Green, IN 46524  
Title V: 085-21804-00105  
Reviewer: ERG/YC  
Date: November 10, 2005**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
			PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Stick (E7018 electrode)	1	0.25	0.0211	0.0009			0.005	2.25E-04	0	0	2.25E-04

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	0.01	2.25E-04	0	0	2.25E-04
Potential Emissions (lbs/day)	0.13	5.40E-03	0	0	5.40E-03
<b>Potential Emissions (tons/year)</b>	<b>0.02</b>	<b>9.86E-04</b>	<b>0.00E+00</b>	<b>0.00E+00</b>	<b>9.86E-04</b>

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

**METHODOLOGY**

Welding emissions (lb/hr) = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)  
 Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day  
 Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.