



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: April 20, 2006
RE: Newmar Corporation / 085-21854-00106
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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NEW SOURCE CONSTRUCTION AND FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Newmar Corporation
9876 West Old State 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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

Operation Permit No.: F085-21854-00106	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 20, 2006 Expiration Date: April 20, 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 2-8-3(b)]

The Permittee owns and operates a stationary service and repair surface coating plant for recreational vehicles.

Authorized individual: President
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
General Source Phone: (574) 773-7791
SIC Code: 3716, 3792
Source Location Status: Kosciusko
Source Status: Attainment for all criteria pollutants
Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not in 1 of 28 Source Categories

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

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

- (a) One (1) paint booth (identified as PB1), constructed in 2006, for paint application on plastic or metal surfaces with a maximum throughput rate of 2.0 RVs per hour using HVLP guns with particulate emissions controlled by dry filters and exhausting at stacks S1 and S2.
- (b) One (1) paint booth (identified as PB2), constructed in 2006, for paint application on plastic and metal surfaces with a maximum throughput rate of 0.15 RVs per hour, using HVLP guns, with particulate emissions controlled by dry filters and exhausting at stacks S3 and S4.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) Five (5) natural gas-fired Thermo-cyclers, each with a maximum heat input capacity of 0.58 MMBtu per hour.
 - (2) Four (4) natural gas-fired Tube-heaters, each with a maximum heat input capacity of 0.058 MMBtu per hour.
 - (3) Two (2) natural gas-fired Air Make-up units used in conjunction with the paint booths (identified as PB1 and PB2), and both rated at 1.9 MMBtu per hour, respectively.
- (b) Infrared cure equipment.

(c) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 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)]

- (a) This permit, F085-21854-00106, 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.4 Term of Conditions [326 IAC 2-1.1-9.5]

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.5 Enforceability [326 IAC 2-8-6]

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

- (a) All terms and conditions of permits established prior to 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) All previous registrations and permits are superseded by this permit.

B.7 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.8 Severability [326 IAC 2-8-4(4)]

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.9 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.10 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.11 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.12 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.13 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(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

(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 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.14 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after installation of the permitted equipment, for the source 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.15 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.

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

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 (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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8 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 needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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 emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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 at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 2-8-4(3)][326 IAC 2-8-5][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

Emissions Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (PSD) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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]

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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management

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

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

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint booth (identified as PB1), constructed in 2006, with a maximum throughput rate of 2.0 RVs per hour, using HLVP guns, with particulate emissions controlled by dry filters and exhausting at stacks S1 and S2.
- (b) One (1) up paint booth (identified as PB2), constructed in 2006, for paint application on plastic and metal surfaces, with a maximum throughput rate of 0.15 RVs per hour, using HVLP guns, with particulate emissions controlled by dry filters and exhausting at stacks S3 and S4.

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

General Construction Conditions

D.1.1 Permit No Defense

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

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

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

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) The input of any single HAP to the two (2) paint booths used for the painting of motor homes shall be less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The input of total HAPs to the two (2) paint booths used for the painting of motor homes shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the two (2) paint booths used for painting of motor homes are subject to the following requirements:

- (a) The VOC input to the two (2) paint booths (identified as PB1 and PB2) shall be limited to seventy-one (71) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The use of High Volume, Low Pressure Spray (HVLP) application system.
- (c) The use of materials with the following VOC content limits:
 - (1) Base coats – 6.2 lb VOC per gallon as applied;
 - (2) Clear coats – 3.5 lb VOC per gallon as applied;
 - (3) Primer Coats – 3.5 lb VOC per gallon as applied; and
 - (4) Cleaning Solvents – 6.5 lb VOC per gallon
- (d) The best management practices for the control of VOC emissions as follows:
 - (1) Sealed lids on containers of VOC containing materials not in use or in storage;
 - (2) Gun and line purging of VOC containing cleaning solvents into approved containers and at the minimum cleaning pressure required to prevent excess atomization;
 - (3) Organized spill response and immediate cleanup for spills of VOC containing materials;
 - (4) Disposal of VOC containing materials may not be performed by allowing solvents to evaporate; and
 - (5) Preventive maintenance procedures for application equipment to prevent spills and releases of VOC containing materials.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP usage limitations contained in Conditions D.1.4 and VOC usage and content limitations contained in Condition D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (S1, S2, S3 and S4) while one or more of the booths are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4(a) and (b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.4(a) and (b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total HAP usage for each month; and
 - (4) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4(a), D.1.4(b), and D.1.5(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Newmar Corporation
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
FESOP No.: 085-21854-00106

**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:

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Newmar Corporation
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
FESOP No.: 085-21854-00106

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) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Newmar Corporation
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
FESOP No.: 085-21854-00106
Facility: Two (2) paint booths (identified as PB1 and PB2)
Parameter: VOC
Limit: Less than seventy-one (71) 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
	VOC	VOC	VOC
	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**

FESOP Quarterly Report

Source Name: Newmar Corporation
 Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
 Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
 FESOP No.: 085-21854-00106
 Facility: Two (2) paint booths (identified as PB1 and PB2)
 Parameter: Single HAP
 Limit: Less than ten (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
	Single HAP	Single HAP	Single HAP
	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**

FESOP Quarterly Report

Source Name: Newmar Corporation
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
FESOP No.: 085-21854-00106
Facility: Two (2) paint booths (identified as PB1 and PB2)
Parameter: Combination of HAPs
Limit: Less than twenty-five (25) 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
	Combination of HAPs	Combination of HAPs	Combination of HAPs
	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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Newmar Corporation
Source Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
Mailing Address: 355 North Delaware, Nappanee, Indiana 46550
FESOP No.: 085-21854-00106

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document (TSD)
for a New Source Construction and
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Newmar Corporation
Source Location:	9876 West Old State Road 30, Etna Green Indiana 46524
County:	Kosciusko
SIC Code:	3716, 3792
Operation Permit No.:	085-21854-00106
Permit Reviewer:	ERG/SD

On February 21, 2006 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in Times Union, Warsaw, Indiana, stating that Newmar Corporation had applied for a New Source Construction and Federally Enforceable State Operating Permit to operate a stationary service and repair surface coating plant for recreational vehicles. The notice also stated that IDEM, 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 February 27, 2006, Newmar Corporation submitted comments on the proposed permit. The summary of the comments and responses are shown below. Deleted text is shown in ~~strikeout~~ and new text is shown in **bold**.

Comment 1:

The Permittee requested to revise item (a) under Insignificant Activities (Section A.3) to indicate that there are five (5) natural gas-fired Thermo-cyclers as opposed to one (1), each with a maximum heat input capacity of 0.58 MMBtu per hour; and that there are four (4) natural gas-fired Tube-heaters as opposed to one (1), each with a maximum heat input capacity of 0.058 MMBtu per hour. In addition, the combined heat input capacity of the two (2) natural gas-fired Air Make-up units is equal to 1.90 MMBtu per hour.

Response to Comment 1:

Section A.3 item (a) has been revised as shown.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) ~~One (1)~~ **Five (5)** natural gas-fired Thermo-cyclers, **each** with a maximum heat input capacity of 0.58 MMBtu per hour.

- (2) ~~One (1)~~ **Four (4)** natural gas-fired Tube-heaters, **each** with a maximum heat input capacity of 0.058 MMBtu per hour.
- (3) Two (2) natural gas-fired Air Make-up units used in conjunction with the paint booths (identified as PB1 and PB2), and **both** rated at 1.9 ~~and 0.46~~ MMBtu per hour, respectively.

...

Emission Units	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	**VOC	CO	NO _x	* HAPs
Paint Booth (PB1)	6.52	6.52	0.0	Less than 71.0	0.0	0.0	Less than 10 and 25 for single and combination of HAPs, respectively
Paint Booth (PB1)	9.47	9.47	0.0		0.0	0.0	
Insignificant Activities	0.10 0.16	0.10 0.16	0.01	0.07 0.12	1.08 1.82	1.29 2.16	Negligible
Total PTE After Issuance	16.1 16.2	16.1 16.2	0.01	Less than 99	1.08 1.82	1.29 2.16	Less than 10 and 25 for single and combination of HAPs, respectively

The potential to emit table (given above) has been updated after the revisions to the insignificant activities. These revisions do not change any of the applicable requirements currently included in the permit. No changes were made to the Technical Support Document (TSD) because IDEM, OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or to the technical support material that occur after public notice are documented in this Addendum to the TSD. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 2:

The Permittee requested the language in Condition B.12(a) be revised from “The Permittee shall prepare... within ninety (90) days after issuance of this permit...” to “The Permittee shall prepare... within ninety (90) days after installation of the permitted equipment...” The emission units may not have been installed within the 90 day time period because Newmar Corporation may not yet have control of the property. The property is currently being leased to another company.

Response to Comment 2:

The Preventive Maintenance Plan given in Condition B.12 (now renumbered to B.14) has been changed as shown:

B.14 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after ~~issuance of this permit~~ **installation of the permitted equipment**, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

...

Upon further review, IDEM, OAQ has decided to make the following revisions to the draft permit. The Table of Contents has been updated as necessary.

1. IDEM, OAQ has clarified Condition B.3 – Permit Term as follows:

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

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

2. IDEM, OAQ has included Terms of Conditions pursuant to 326 IAC 2-1.1-9.5 as shown below. The remaining conditions under Section B were renumbered accordingly.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

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.**

3. IDEM, OAQ has removed provisions of 326 IAC 2-1.1-9.5 (Prior Permits Superseded condition) from Section A (Source Summary) and placed it under Section B (General Conditions).

~~A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

- ~~(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either~~
 - ~~(1) incorporated as originally stated,~~
 - ~~(2) revised, or~~
 - ~~(3) deleted~~~~by this permit.~~
- ~~(b) All previous registrations and permits are superseded by this permit.~~

B.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of permits established prior to 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) All previous registrations and permits are superseded by this permit.

4. IDEM, OAQ has clarified the Permit Renewal condition as shown below:

B.4618 Permit Renewal [326 IAC 2-8-3(h)]

...

~~(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

~~(4b)~~ A timely renewal application is one that is:

~~(A1)~~ Submitted at least nine (9) months prior to the date of the expiration of this permit;
and

~~(B2)~~ If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

~~(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

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 2-8 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.

Newmar Corporation
9876 West Old State Road 30
Etna Green, Indiana 46524

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Newmar Corporation, 9876 West Old State Road 30, Etna Green, Indiana, 46524, completed construction of the two (2) paint booths (identified as PB1 and PB2) on _____ in conformity with the requirements and intent of the permit application received by the Office of Air Quality on October 3, 2005 and as permitted pursuant to New Source Review and Federally Enforceable Source Operating Permit No. 21854, Plant ID No. 085-00106 issued on _____.
5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature _____

Name (typed or printed)

Appendix B

Best Available Control Technology (BACT) Determinations

Source Background and Description

Source Name:	Newmar Corporation
Source Location:	9876 West Old State Road 30, Etna Green, Indiana 46524
County:	Kosciusko
SIC Code:	3716, 3792
FESOP No.:	085-21854-00106
Permit Reviewer:	ERG/SD

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for the construction of two (2) surface coating booths used for service and repair of recreational vehicles at an existing complex owned by Newmar Corporation and located at 9876 West Old State Road 30, Etna Green, Indiana. The two (2) surface coating booths will be used for the purpose of touchup painting on motor homes returned by customers for routine repair. The booths will apply primer coat (when and as needed), base coat and clear coat.

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT is required for all facilities constructed after January 1, 1980 that have potential VOC emissions of equal to or greater than twenty-five (25) tons per year and are not regulated by other rules in 326 IAC 8. Based on the calculations (see Appendix A) and the analysis of applicable state regulations (see State Rule Applicability section of TSD), the modification at this source is subject to the requirements of 326 IAC 8-1-6.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology* process, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

- (a) Identify all potentially available control options;
- (b) Eliminate technically infeasible control options;
- (c) Rank remaining control technologies by control effectiveness;
- (d) Evaluate the most effective controls and document the results as necessary; and
- (e) Select BACT.

In accordance with EPA guidance, the BACT analysis should take into account the energy, environmental, and economic impacts. Emission reductions may be achieved through the application of available control techniques, changes in process design, and/or operational limitations. These BACT determinations are based on the following information:

- (a) The BACT analysis information submitted by Newmar Corporation on October 3, 2005;
- (b) Information from vendors/suppliers;
- (c) The EPA RACT/BACT/LAER (RBLC) Clearinghouse; and
- (d) State and local air quality permits.

VOC BACT

Newmar Corporation will construct and operate two (2) surface coating booths for the purpose of touch-up painting motor homes returned by customers for routine repair. The Permittee will use the booths to apply primer coat (when and as needed), basecoat, and clear coat using HVLP spray guns. The application equipment will be cleaned with paint related solvents. The potential VOC emissions from the new construction (two (2) surface coating booths) are each greater than twenty-five (25) tons per year. Since this process is not regulated by any other rule in 326 IAC 8, the Permittee is required to control VOC emissions from the new booths pursuant to the provisions of 326 IAC 8-1-6 (BACT).

Step 1 – Regulatory Database Review

The following databases were reviewed to identify and evaluate the various BACT requirements currently in place to control VOC emissions from the RV motor home repair plants and touch-up surface coating operations:

- (a) IDEM, OAQ and the Permittee searched EPA’s RACT/BACT/LAER Clearinghouse (RBLC) for SIC code 3716. The search identified two (2) surface coating facilities for recreational vehicle manufacturers: Monaco Coach Corporation for 2002 and 2005; and CDI (Winnebago) for 2004. CDI has a BACT determination of 80 tons of VOC emissions on three (3) booths, while Monaco’s BACT is included in the table below.
- (b) Indiana Permit Files: IDEM, OAQ has issued number of Title V and construction permits for recreational vehicle manufacturing plants in the recent past. A review of the permits is listed below.

Company	PBLD ID or Permit #	Date Issued and State	BACT Requirements
Fleetwood # 44	SSM	10/19/2001 (IN)	Daily usage limit (111.5 lbs/unit) Low VOC coatings (not specified) Air atomized spray P2 work practices
Dynamax	SSM	07/07/2000	Basecoat 6.2 lbs/gal Clearcoat 4.4 lbs/gal HVLP spray equipment P2 work practices
Newmar	Construction	Not dated	HVLP spray equipment P2 work practices Annual VOC limit of 70 tons
Gulf Stream	Construction	Not dated	HVLP spray equipment P2 work practices Annual VOC limit of 129 tons Primer / Sealer 5.64 lbs/gal Basecoat 6.29 lbs/gal Topcoat (Clearcoat) 4.45 lbs/gal
Monaco Coach	SSM	2002 and 2005	HVLP spray equipment P2 work practices Annual VOC limit of 539 tons Primer / Sealer 3.5 lbs/gal Basecoat 6.5 lbs/gal Topcoat (Clearcoat) 3.5 lbs/gal Basecoat (Clearcoat) 4.5 lbs/gal Lacquer thinners & cleaners 6.5 lbs/gal

- (c) Other Permit Files: Oregon represents one of the leading areas in the country that manufacture recreational motor homes. A review of recently issued permits in Oregon shows one permit issued to Monaco, a painting facility for motor homes, while a review of issued permits in Michigan shows two permits issued to Ford Motor Company and General Motors – Lansing. The facilities and associated operating limits are listed as shown below:

Company	PBLD ID or Permit #	Date Issued and State	BACT Requirements
Monaco Coach	SSM	10/19/2001 (OR)	HVLP spray equipment P2 work practices Pretreatment 6.5 lbs/gal Primer/ Surfacer 2.1 lbs/gal Primer/ Sealer 3.5 lbs/gal Basecoat / Clearcoat 4.5 (lbc + 2cc/3) Topcoat 3.5 lbs/gal Specialty coating 7.0 lbs/gal
Ford Motors	Not Available	12/06/1999 (MI)	Use of RTO for curing oven, Rotary Concentrator with RTO for Robotic application booths Basecoat 3.4 lbs/gal Clearcoat 3.4 lbs/gal Use of waterborne coatings High Transfer Efficient Application Methods
General Motors – Lansing	Not Available	12/27/2000 (MI)	Use of electrostatic primer 0.04 lbs/gal Waterborne basecoat Solvent borne Clearcoat Rotary Concentrator with Thermal Oxidizer High Transfer Efficient Application Methods

(d) The search for the motor home painting operation in South Coast Air Quality Management District (AQMD) Air Permits identified the following:

Company	PBLD ID or Permit #	Date Issued and State	Requirements
Fleetwood Motor Homes, Riverside	CP# 407612	12/24/03 (CA)	Thermal oxidizers at 98% control efficiency; VOC < 5.1 tons per year

Step 2 – Identify Control Options

The following available technologies were identified and evaluated to control VOC emissions from the RV motor homes repair and touch-up surface coating operations:

(a) Solvent/Material Substitution

(1) Waterborne Coatings are used to reduce VOC emissions from surface coatings operations. Paints and other products can be reformulated using water to replace some of the volatile organic compounds; certain formulations of coating are not amenable to water formulation because of a reactive role of the solvent or of the solvent’s ability to carry other paint components. In waterborne coatings, the water becomes a carrier solvent in the process, and is evaporated during the drying process. The drying time of waterborne coatings is dependent upon temperature and humidity, with higher humidity necessitating longer drying times. Even with the addition of a drying oven to shorten the drying time, the product cannot be handled as soon as with solvent-based coating systems. Furthermore, the RV coaches contain components made of wood, fiberglass reinforced plastics (FRP), other plastics, tires, rubber tubing, and various other rubber parts. FRP is a “heat sensitive material” as that term is defined by USEPA in the above-referenced emission guidance document. The guidance document specifically points out that “ovens cannot be used” in the transportation industry “because these assembled products include heat sensitive materials (i.e. tires, rubber tubing, plastic parts, electrical components, etc.)”. In August 1998, EPA issued guidance on the surface coating of plastic parts where it specifically acknowledged that “the nature of some plastic substrates combined with the desired finish characteristics, currently appear to require high VOC content coatings.” The current waterborne coating formulations have experienced loss of gloss and color over time compared with conventional paint systems.

Because of customer based demands for high quality finish, longer drying time and inability to use drying ovens, and lack of gloss retention, the use of waterborne coatings for repair and touch-up coating of the RV motor homes at this facility is not considered a viable option.

- (2) Raw Material Replacement: Newmar's motor homes are coated for repairs and as such the coating used must match the type originally used on motor homes to ensure color matching. However, Newmar has evaluated the use of low VOC content coatings and cleaning materials for use in the two (2) surface coating booths in a continuing effort to reduce VOC and HAP emissions from all areas. These coatings and cleaning materials are comparable to those identified for the two (2) sources of the same SIC Code:

1. Base coats – 6.2 lb VOC per gallon as applied;
2. Clear coats – 3.5 lb VOC per gallon as applied;
3. Primer Coats – 3.5 lb VOC per gallon as applied; and
4. Cleaning Solvents – 6.5 lb VOC per gallon

- (b) Change in Application Methods

The Permittee has proposed to use High Volume-Low Pressure (HVLP) spray equipment with an effective transfer efficiency of 60% or equivalent to apply coatings at this facility for repair and touch-up operations. A number of newer technologies are available for paint application such as electrostatic coating and robotic coating. However, HVLP spray equipment is considered feasible for repair and touch-up operations since these operations will be conducted on small areas of motor homes. Electrostatic coating is considered technologically infeasible because the majority of the exterior of recreational vehicles is made up of fiberglass and is non-conductive, while robotic coating is generally used for large surface areas, i.e. when entire parts are coated.

- (c) Newmar Corporation also evaluated a variety of control technologies, including the following:

- (1) Carbon adsorption;
- (2) Chemical scrubber;
- (3) Condensation;
- (4) Biofiltration;
- (5) Catalytic Oxidation;
- (6) Rotary Concentrator with Regenerative Thermal Oxidation (RTO); and
- (7) Regenerative Thermal Oxidation (RTO).

Step 3 – Eliminate Technically Infeasible Control Options

Based on the results from the RBLC database search, vendor review, and an evaluation of the control technologies, IDEM, OAQ has determined that the use of a carbon adsorption, chemical scrubber, condensation, biofiltration, catalytic oxidation, and rotary concentrator with RTO are not technically feasible options for this source for the following reasons:

- (a) The use of carbon adsorption system is infeasible because the presence of high volumes and low concentration of VOC within the waste streams generated at the source will decrease the control efficiency of the system. Adsorption is best suited for low volume, high concentration waste streams of VOC that can be recovered as the carbon bed is regenerated. Furthermore, the paints

- used at Newmar contain siloxane compounds, which are not recommended for carbon adsorption because siloxane compounds coat the adsorbent material rendering it ineffective.
- (b) The use of a chemical scrubber is technically infeasible because the waste streams generated at Newmar contain various components and thus may require a different solvent (where the waste stream is dissolved) for each target chemical. The scrubber solvent must be then treated to remove captured solvents.
 - (c) The use of condensation is infeasible because it requires extremely low temperatures (on the order of negative 160 degree F or lower to achieve 90 percent efficiency) to achieve a significant reduction in VOC emissions. A low temperature would be required because the exhaust streams at Newmar contain very low concentrations of VOC.
 - (d) The use of biofiltration is relatively a new technology and to date has limited applications in air quality control. The control efficiency for this technology is dependent upon operational parameters such as VOC concentration, non-variable VOC compounds, consistent humidity levels, and ambient temperatures. Moreover this technology is usually associated with low air volumes. Should any of these parameters vary, partial or complete bed activity levels will be affected which would in turn affect the control efficiency.
 - (e) The use of catalytic oxidation is not recommended for applications when siloxanes are used or the potential for solids carryover from the process exists. Siloxane compounds can accumulate on the surface of the catalyst, which creates maintenance and pressure drop problems due to fouling and the same applies for potential particulate carryover. Catalytic oxidizers rely upon the VOC content of the vent stream to raise the outlet temperature in order to achieve good destruction efficiencies. Typically VOC concentrations greater than ten percent (10%) of the LEL are required to maintain efficient operation, whereas the VOC concentration from the two (2) surface coating booths is less than one percent (1%) of the LEL.
 - (f) The use of a rotary (zeolite) concentrator with regenerative thermal oxidizer is not recommended for applications where siloxanes are used or the potential for solids carryover from the process exists. The Siloxane compounds tend to accumulate on the surface of the catalyst, which creates maintenance and pressure drop problems due to fouling of the zeolite adsorption material. The rotary concentrator with regenerative thermal oxidizer is therefore not technically feasible for these surface coating booths proposed by Newmar.

Step 4 – Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible approach for controlling VOC emissions from the two (2) surface coating booths is as follows:

Control Technology	Control Efficiency (%)
Regenerative Thermal Oxidizer	Less than or equal to 98

The VOC reduction efficiency for thermal incineration is least affected by waste stream characteristics. A properly designed thermal incinerator can handle almost all solvent mixtures (except for fluorinated or chlorinated solvents), concentrations, and variations thereof and meet all regulatory standards. While the combustion of halogenated organics will result in HCl and HF emissions which must be removed by a caustic scrubber, the principal technical deficiency is the high fuel consumption required due to the intermittent nature of the operations and the very low heating value of the waste streams.

Step 5 – Evaluate the Most Effective Controls and Document Results

Newmar Corporation provided IDEM, OAQ with a thorough economic analysis of the technically feasible control options. The analysis estimated the cost of the VOC control equipment, including the initial capital cost of the various components intrinsic to the complete system, and the estimated annual operating costs. The estimated total capital cost was calculated with the use of

a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on information from the vendors and a literature review. The analysis assumed an interest rate of 7% and an equipment life of 10 years. The basis of cost effectiveness used to evaluate the control options is the ratio of the annualized cost to the amount of VOC (tons) removed per year. Note that the cost effectiveness of each option accounts for VOC destruction at 98% for incineration technologies (i.e. add-on controls). Baseline costs were developed for each technology for waste streams with a flow rate of 60,000 CFM for the proposed two (2) new surface coating booths. Costs were then developed for the feasible control options. The costs for this option was then compared to a final option, which consists of the operating plant without add-on controls, to arrive at a determination of BACT for VOC emissions from the proposed emission units. The options considered were as follows:

- (a) Regenerative Thermal Oxidizer with or without a heat exchanger
- (b) Operation of the proposed booths without add-on controls

A complete breakdown of the costs associated with regenerative thermal oxidizer is included in Appendix C. A summary of the cost figures determined in the analysis is provided in the table below:

Control Option	* Efficiency (%)	Equipment Cost (\$)	Total Operating Cost (\$/yr)	Total Annualized Costs (\$/yr)	Limited VOC (tons/year)	Potential VOC removal (tons/year)	Cost Effectiveness (\$/ton VOC removed)
RTO without heat exchanger	98%	\$1,584,117	\$1,177,890	\$1,403,436	71.0	69.7	\$20,170
RTO with heat exchanger	98%	\$1,599,613	\$808,488	\$1,036,241	71.0	69.7	\$14,893

* Removal values for the control option is based on emission capture from coating operations and the corresponding destruction efficiency of the control equipment.

Step 6 – Select BACT

The cost effectiveness, as determined by the ratio of the annualized costs to the tons of VOC removed per year, for the RTO with and without heat exchanger is equal to \$14,872 and \$20,142 per ton of VOC removed, respectively. Therefore, IDEM, OAQ has determined the installation of this control is economically infeasible for Newmar. This determination is based on the following information:

- (a) Low VOC content coatings with high transfer efficiency application methods were established as BACT for similar sources; and
- (b) The cost effectiveness (in \$ per ton VOC removed) of add-on controls for Newmar was significantly higher than the range determined for the sources listed in Step 1. Most of these sources had annual VOC limits and pollution prevention work practice standards established as BACT with no requirements for add-on controls. The only exception was Ford Motors in MI, for which the cost effectiveness for a RTO was equal to \$4,819 per ton of VOC removed. Fleetwood Motor Homes located in CA did not conduct a cost analysis. Therefore, IDEM, OAQ has determined the BACT for the proposed construction of two (2) new touch-up paint booths is as follows:
 - (1) The VOC input to the two (2) touch-up paint booths (identified as PB1 and PB2) shall be limited to seventy-one (71) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The use of a High Volume, Low Pressure Spray (HVLP) application system.

- (3) The use of materials with the following VOC content limits:
 - (i) Base coats – 6.2 lb VOC per gallon as applied;
 - (ii) Clear coats – 3.5 lb VOC per gallon as applied;
 - (iii) Primer Coats – 3.5 lb VOC per gallon as applied; and
 - (iv) Cleaning Solvents – 6.5 lb VOC per gallon

- (4) The use of best management practices for the control of VOC emissions as follows:
 - (i) Sealed lids on containers of VOC containing materials not in use or in storage;
 - (ii) Gun and line purging of VOC containing cleaning solvents into approved containers and at the minimum cleaning pressure required to prevent excess atomization;
 - (iii) Organized spill response and immediate cleanup for spills of VOC containing materials;
 - (iv) Disposal of VOC containing materials may not be performed by allowing solvents to evaporate; and
 - (v) Preventive maintenance procedures for application equipment to prevent spills and releases of VOC containing materials.

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

Technical Support Document (TSD) for a New Source Construction
and Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Newmar Corporation
Source Location:	9876 West Old State Road 30, Etna Green, Indiana 46524
County:	Kosciusko
SIC Code:	3716 and 3792
Operation Permit No.:	085-21854-00106
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a New Source Construction and FESOP application from Newmar Corporation relating to the construction and operation of service and repair plant for recreational vehicles.

History

On October 3, 2005, Newmar Corporation submitted an application to the IDEM, OAQ requesting approval for the construction and operation of a service and repair facility to be located at 9876 Old Road 30, Etna Green, Indiana. The service and repair facility will consist of two (2) paint booths used for painting motor homes returned by customers for routine repair and for some minor production runs. The two (2) paint booths will be used to apply primer coat (as needed), base coat, and clear coat. The application equipment will be cleaned with paint related solvents.

Currently, the proposed site for construction and operation of the two (2) paint booths has been leased by Newmar Corporation to Gulf Stream. Gulf Stream is a manufacturer of recreational vehicles and applied for a Part 70 Permit (No.: 085-21804-00105), which has been drafted and is currently pending.

The location address for the two (2) companies is 9876 West Old State Road 30 in Etna Green, Indiana. However, Newmar Corporation will commence operation after the lease for Gulf Stream expires in July, 2006. The two (2) companies will not be under common control, will not share equipment and neither company will act as a support facility for the other. They do not have the same operations. Gulf Stream assembles travel trailers while Newmar Corporation will service and repair the recreational vehicles returned by their customers.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The following are the proposed emission units and pollution control devices for this plant:

- (a) One (1) paint booth (identified as PB1), constructed in 2006, for paint application on plastic or metal surfaces with a maximum throughput rate of 2.0 RVs per hour, using HVLP guns, with particulate emissions controlled by dry filters and exhausting at stacks S1 and S2.
- (b) One (1) paint booth (identified as PB2), constructed in 2006, for paint application on plastic and metal surfaces with a maximum throughput rate of 0.15 RVs per hour, using HVLP guns, with particulate emissions controlled by dry filters and exhausting at stacks S3 and S4.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) One (1) natural gas-fired Thermo-cycler with a maximum heat input capacity of 0.58 MMBtu per hour.
 - (2) One (1) natural gas-fired Tube-heater with a maximum heat input capacity of 0.058 MMBtu per hour.
 - (3) Two (2) natural gas-fired Air Make-up units used in conjunction with the paint booths (identified as PB1 and PB2), and rated at 1.9 and 0.46 MMBtu per hour, respectively.
- (b) Infrared cure equipment.
- (c) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

Existing Approvals

There are no previous approvals issued to this source at this location.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the New Source Construction and FESOP 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 administratively complete New Source Construction and FESOP application for the purposes of this review was received on October 3, 2005. Additional information was received on October 24, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations in Appendix A (pages 1 through 7).

Potential to Emit

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

Pollutant	Potential to Emit (tons/year)
PM	16.1
PM10	16.1
SO ₂	0.01
VOC	92.9
CO	1.08
NO _x	1.29

HAPs	Potential to Emit (tons/year)
Benzene	2.70E-05
Dichlorobenzene	1.54E-05
Formaldehyde	9.66E-04
Hexane	2.32E-02
Toluene	15.1
Ethylbenzene	2.27
Xylene	12.1
Ethyl Acetate	6.28
MEK	6.29
MIK	3.92
2-Butonyethyl Acetate	1.23
1,2-4-Trimethylbenzene	0.27
total	47.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its HAP emissions below major source threshold levels.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all other pollutants are less than 100 tons per year.
- (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 and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted for a FESOP. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after

issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Units	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	**VOC	CO	NO _x	* HAPs
Paint Booth (PB1)	6.52	6.52	0.0	Less than 71.0	0.0	0.0	Less than 10 and 25 for single and combination of HAPs, respectively
Paint Booth (PB1)	9.47	9.47	0.0		0.0	0.0	
Insignificant Activities	0.10	0.10	0.01	0.07	1.08	1.29	Negligible
Total PTE After Issuance	16.1	16.1	0.01	Less than 71.07	1.08	1.29	Less than 10 and 25 for single and combination of HAPs, respectively

*Potential to emit of HAPs are limited pursuant to 326 IAC 2-8 (FESOP) to less than major source threshold levels per twelve (12) consecutive month period, with compliance determined at the end of each month.

**The VOC emissions from the paint booths PB1 and PB2 are limited to less than 71.0 tons per year by a VOC usage limitation included in the BACT requirements for 326 IAC 8-1-6.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	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. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides 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 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (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. See the State Rule Applicability - Entire Source section.

- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	16.1
PM10	16.1
SO ₂	0.01
VOC	<71.1
CO	1.08
NO _x	1.29
Single HAP	<10
Combination HAPs	<25

This new source is not a major stationary source (under PSD) 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.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The requirements of 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products are not included in this permit for this source because the Permittee has requested to operate the service and repair paint booths for recreational vehicles under the provisions of 326 IAC 2-8 (FESOP), which limits HAP emissions to below major source threshold levels.
- (c) The requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (326 IAC 20-56) are not included in this permit for this source because the Permittee has requested to operate the service and repair paint booths for recreational vehicles under the provisions of 326 IAC 2-8 (FESOP), which limits HAP emissions to below major source threshold levels. Moreover, the source does not manufacture RVs. The facilities at this plant are used for service and repair only.
- (d) The requirements of 40 CFR 63, Subpart MMMM, National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products are not included in this permit for this source. Pursuant to 40 CFR 63.3881(c)(16), the NESHAP 40 CFR 63, Subpart MMMM does not apply to the surface coating of assembled on-road vehicles that are subject to the requirements of 40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

State Rule Applicability – Entire Source

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

Newmar Corporation at Etna Green, Indiana will be constructed in 2005 and is not one (1) of the twenty-eight (28) source categories. The potential to emit of each regulated pollutant before control is less than the two hundred and fifty (250) tons per year PSD threshold (see Appendix A). Therefore, the source is a minor source under PSD and the provisions of 326 IAC 2-2 do not apply.

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

The potential to emit of HAPs from the operation of this service and repair facility consisting of two (2) paint booths used for painting of motor homes shall be limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs, pursuant to 326 IAC 2-8 (FESOP).

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). This source has limited the potential to emit of each criteria pollutant and HAPs to less than major source threshold levels pursuant to the provisions of 326 IAC 2-8 (FESOP). Therefore, the provisions of 326 IAC 2-6 do not apply.

326 IAC 2-8 (FESOP)

- (a) The input of any single HAP to the two (2) paint booths used for painting of motor homes shall be less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The input of total HAPs to the two (2) paint booths used for painting of motor homes shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) Any change or modification that would increase the input of VOC to the two (2) paint booths used for painting motor homes to equal to or greater than 100 tons per year shall require prior approval from IDEM, OAQ.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 2-8-5(a)(4) (Operation of Equipment)

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

326 IAC 5-1 (Opacity Limitations)

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Surface Coating Operations
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326 IAC 8-1-6 (New Facilities; General Reduction Requirement)

The potential VOC emissions from the two (2) new paint booths (identified as PB1 and PB2) used for painting of motor homes are greater than twenty-five (25) tons per year each and the booths will be constructed in 2006, therefore, the provisions of 326 IAC 8-1-6 apply. Based on the submitted BACT analysis (see Appendix C), IDEM, OAQ has determined BACT to be equivalent to the following requirements:

- (a) The VOC input to the two (2) paint booths (identified as PB1 and PB2) shall be limited to seventy-one (71) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The use of High Volume, Low Pressure Spray (HVLP) application system.
- (c) The use of materials with the following VOC content limits:
 - (1) Base coats – 6.2 lb VOC per gallon as applied;
 - (2) Clear coats – 3.5 lb VOC per gallon as applied;
 - (3) Primer Coats – 3.5 lb VOC per gallon as applied; and
 - (4) Cleaning Solvents – 6.5 lb VOC per gallon
- (d) The use of best management practices for the control of VOC emissions as follows:
 - (1) Sealed lids on containers of VOC containing materials not in use or in storage;
 - (2) Gun and line purging of VOC containing cleaning solvents into approved containers and at the minimum cleaning pressure required to prevent excess atomization;
 - (3) Organized spill response and immediate cleanup for spills of VOC containing materials;
 - (4) Disposal of VOC containing materials may not be performed by allowing solvents to evaporate; and
 - (5) Preventive maintenance procedures for application equipment to prevent spills and releases of VOC containing materials.

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

Pursuant to 326 IAC 6-3-2(d), particulate from each of the two (2) paint booths used for painting of motor homes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not applicable to the two (2) paint booths because the production at this plant will be less than 35 vehicles per day.

State Rule Applicability - Air Make-up Units, Thermo-cycler, Tube-heater

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

The natural gas-fired bake units (air make-up units, thermo-cycler and tube-heater) are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from these units are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are exempt from the 326 IAC 6-3-2 limitations.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion units (air make-up units, thermo-cycler, and tube-heater) are not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because these units are not sources of indirect heating.

Testing Requirements

No stack test is required in this FESOP because compliance with the HAP usage limits (major pollutants) can be determined by keeping records of the amount of HAPs applied.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The two (2) paint booths used for painting of motor homes have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (S1, S2, S3 and S4) while one or more of the booths are in operation. The Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The

Response to Excursions and Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because the dry particulate filters must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The construction and operation of this service and repair plant for recreational vehicles shall be subject to the conditions of the New Source Construction and FESOP 085-21854-00106.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Combustion Units**

Company Name: Newmar Corporation
Address: 9876 Old Road 30, Etna Green, Indiana 46524
New Construction and FESOP: 085-21854
Plt ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMSCF/year)

3.00 (4 units total)

25.7

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMSCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.10	0.10	0.01	1.29	0.07	1.08

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

**Emission factor for NOx (Uncontrolled) = 100 lb/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 (July, 1998).

All emission factors are based on normal firing.

METHODOLOGY

Potential throughput (MMSCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

PTE (tons/year) = Potential throughput (MMSCF/year) * Emission factor (lb/MMSCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Combustion Units

Company Name: Newmar Corporation
Address: 9876 Old Road 30, Etna Green, Indiana 46524
New Construction and FESOP: 085-21854
Plt ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	2.70E-05	1.54E-05	9.66E-04	2.32E-02	4.38E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	6.44E-06	1.42E-05	1.80E-05	4.89E-06	2.70E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Summary**

Company Name: Newmar Corporation
Address: 9876 Old Road 30, Etna Green, Indiana 46524
New Construction and FESOP: 085-21854
Plt ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO₂	NO_x	VOC	CO	HAPs
Combustion Units	0.10	0.10	0.01	1.29	0.07	1.08	
Paint Booth P-1	6.52	6.52			34.0		14.0
Paint Booth P-2	9.47	9.47			58.8		33.5
TOTALS	16.1	16.1	0.01	1.29	92.9	1.08	47.5

* Highest Single HAP (Toluene) = 15.1

Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO) without Heat Recovery Exchanger

Company Name: Newmar Corporation
Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
FESOP: 085-21854
Plt ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

Regenerative Thermal Oxidizer (RTO)

Design Air Flow Rate (scfm): 60,000 (provided by source)

I. Capital Cost

(formula)*

1. Purchased Equipment:

Basic Equipment & Auxiliaries (A)		\$795,500	(provided by source)
Instruments & controls	0.10 A	\$79,550	(separate from the price quote)
Taxes	0.05 A	\$39,775	(Indiana Tax Code)
Freight	0.05 A	\$39,775	
Total Purchase Cost (B)		\$954,600	

2. Direct Installation Costs:

Foundation & Support Installation	0.08 B	\$76,368	
Erection & Handling	0.14 B	\$133,644	
Electrical	0.04 B	\$38,184	
Enclosure		NA	
Piping	0.02 B	\$19,092	
Insulation for ductwork	0.01 B	\$9,546	
Ductwork		\$18,733	(as provided by the source)
Painting	0.01 B	\$9,546	
Site Preparation (As required)		\$9,386	(as provided by the source)
Facilities and Buildings (As required)		\$19,092	
Total Direct Installation Cost (C)		\$333,591	

Total Direct Capital Cost (TDC) (B+C) \$1,288,191

3. Indirect Costs:

Engineering	0.10 B	\$95,460	
Loss of Production Cost		\$0	
Construction & Field Expenses	0.05 B	\$47,730	
Contractor Fees	0.10 B	\$95,460	
Start Up	0.02 B	\$19,092	
Performance Tests	0.01 B	\$9,546	
Contingencies	0.03 B	\$28,638	
Total Indirect Cost (D)		\$295,926	

Total Installation Capital Cost (B+C+D) \$1,584,117

Capital Recovery Factor (7%, 10 year) 0.1424

Capital Recovery Cost (E) \$225,547

Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO) without Heat Recovery Exchanger

Company Name: Newmar Corporation
Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
FESOP: 085-21854
Plt ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

II. ANNUALIZED COSTS

1. Direct Operating Costs:

Operating Labor (F)		\$10,956	
a. Number of Employees		1.00	
b. Cost/Employee/Hour		\$20.0	(provided by source)
c. Operating Hours/Year		548	
Supervisory Labor (F1)	0.15 F	\$1,643	
Maintenance Labor (F2)		\$10,950	
a. Number of Employees		1.00	
b. Cost/Employee/Hour		\$20.0	(provided by source)
c. Operating Hours/Year		548	
Maintenance Material (F3)	1 F2	\$10,950	
Utilities			
a. Natural Gas		\$855,677	
MMBTU/HR Input		8.00	(provided by source)
Operating Hours/Year		8,760	
Cost/MMBTU (12 month average)		\$12.21	(utility bill for the source, 2005)
b. Electricity		\$219,491	
KW Requirements/Hr		261.0	
KWH/YR		8,760	(provided by source)
Cost/KWH (12 month average)		\$0.0960	(utility bill for the source, 2005)
Water		\$0	
Air		\$0	
Replacement Parts		\$0	
Total Direct Operating Cost (G)		\$1,109,667	

2. Indirect Operating Costs:

Overhead	0.6 (F+F1+F2+F3)	\$20,700	
Insurance, and Administrative Costs	0.03 (B+C+D)	\$47,524	
Total Indirect Operating Cost (H)		\$68,223	

3. Heat Recovery Credits (I):

		\$369,866	
MMBTU/HR Input		8.00	(provided by source)
Operating Hours/Year		8,760	
Unit Heat Efficiency		95%	
Heat Exchange Efficiency		65%	
Percent Heat Recovery		70%	
Cost/MMBTU		\$12.21	(rate in Indiana)

Total Annual Operating Cost (G+H) \$1,177,890

Total Annualized Cost	(E+G+H)	\$1,403,436
Limited PTE (tons/yr)	71.0 (as calculated in Appendix A)	
Overall Control Efficiency		98.0%
Pollution Removed (tons/yr)		69.6
Cost Effectiveness (\$ /ton VOC removed)		\$20,170

**Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO) with Heat Recovery Exchanger**

Company Name: Newmar Corporation
Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
FESOP: 085-21854
Pit ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

Regenerative Thermal Oxidizer (RTO)

Design Air Flow Rate (scfm): 60,000 (provided by source)

I. Capital Cost

(formula)*

1. Purchased Equipment:

Basic Equipment & Auxiliaries (A)		\$803,500	(provided by source)
Instruments & controls	0.10 A	\$80,350	(separate from the price quote)
Taxes	0.05 A	\$40,175	(Indiana Tax Code)
Freight	0.05 A	\$40,175	
Total Purchase Cost (B)		\$964,200	

2. Direct Installation Costs:

Foundation & Support Installation	0.08 B	\$77,136	
Erection & Handling	0.14 B	\$134,988	
Electrical	0.04 B	\$38,568	
Enclosure		NA	
Piping	0.02 B	\$19,284	
Insulation for ductwork	0.01 B	\$9,642	
Ductwork		\$18,773	(as provided by the source)
Painting	0.01 B	\$9,642	
Site Preparation (As required)		\$9,386	(as provided by the source)
Facilities and Buildings (As required)		\$19,092	
Total Direct Installation Cost (C)		\$336,511	

Total Direct Capital Cost (TDC) (B+C) \$1,300,711

3. Indirect Costs:

Engineering	0.10 B	\$96,420	
Loss of Production Cost		\$0	
Construction & Field Expenses	0.05 B	\$48,210	
Contractor Fees	0.10 B	\$96,420	
Start Up	0.02 B	\$19,284	
Performance Tests	0.01 B	\$9,642	
Contingencies	0.03 B	\$28,926	
Total Indirect Cost (D)		\$298,902	

Total Installation Capital Cost (B+C+D) \$1,599,613

Capital Recovery Factor (7%, 10 year) 0.1424

Capital Recovery Cost (E) \$227,753

Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO) with Heat Recovery Exchanger

Company Name: Newmar Corporation
Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
FESOP: 085-21854
Pit ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

II. ANNUALIZED COSTS

1. Direct Operating Costs:

Operating Labor (F)		\$10,956	
a. Number of Employees		1.00	
b. Cost/Employee/Hour		\$20.0	(provided by source)
c. Operating Hours/Year		548	
Supervisory Labor (F1)	0.15 F	\$1,643	
Maintenance Labor (F2)		\$10,950	
a. Number of Employees		1.00	
b. Cost/Employee/Hour		\$20.0	(provided by source)
c. Operating Hours/Year		548	
Maintenance Material (F3)	1 F2	\$10,950	
Utilities			
a. Natural Gas		\$855,677	
MMBTU/HR Input		8.00	(provided by source)
Operating Hours/Year		8,760	
Cost/MMBTU (12 month average)		\$12.21	(utility bill for the source, 2005)
b. Electricity		\$219,491	
KW Requirements/Hr		261.0	
KWH/YR		8,760	(provided by source)
Cost/KWH (12 month average)		\$0.0960	(utility bill for the source, 2005)
Water		\$0	
Air		\$0	
Replacement Parts		\$0	
Total Direct Operating Cost (G)		\$1,109,667	

2. Indirect Operating Costs:

Overhead	0.6 (F+F1+F2+F3)	\$20,700	
Insurance, and Administrative Costs	0.03 (B+C+D)	\$47,988	
Total Indirect Operating Cost (H)		\$68,688	

3. Heat Recovery Credits (I):

MMBTU/HR Input		8.00	(provided by source)
Operating Hours/Year		8,760	
Unit Heat Efficiency		95%	
Heat Exchange Efficiency		65%	
Percent Heat Recovery		70%	
Cost/MMBTU		\$12.21	(rate in Indiana)

Total Annual Operating Cost (G+H-I) \$808,488

Total Annualized Cost	(E+G+H-I)	\$1,036,241
Limited PTE (tons/yr)	71.0	(as calculated in Appendix A)
Overall Control Efficiency		98.0%
Pollution Removed (tons/yr)		69.6
Cost Effectiveness (\$ /ton VOC removed)		\$14,893

**Appendix C: Cost Analysis for Control Devices
Summary**

Company Name: Newmar Corporation
Address: 9876 West Old State Road 30, Etna Green, Indiana 46524
FESOP: 085-21854
Pit ID: 085-00106
Reviewer: ERG/SD
Date: February 2, 2006

NOTES:

1. The cost analysis formula is from EPA Air Pollution Control Cost Manual, Sixth Edition (01/02).
2. The control efficiency is as provided by the manufacturer, including capture efficiency and destruction efficiency.
3. The natural gas price and energy price is based on the utility bills (12 month average) provided by the Permittee for 2005.