



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 13, 2009

RE: Turning Wheel RV Center / 039-27307-00687

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



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SOURCE SPECIFIC OPERATING AGREEMENT OFFICE OF AIR QUALITY

**Turning Wheel RV Center
1901 W. Hively Avenue
Elkhart, Indiana 46517**

(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 SSOA.

This SSOA is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-9 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this SSOA, are those applicable at the time the SSOA was issued. The issuance or possession of this SSOA shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.

Source Specific Operating Agreement No. 039-27307-00687

Issued by:

Alfred C. Dumatai, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Issuance Date:

March 13, 2009

SECTION A

SOURCE SUMMARY

This SSOA 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 and A.2 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 pursuant to 326 IAC 2.

A.1 General Information

The Permittee owns and operates a stationary recreational vehicle repair and service operation.

Source Address:	1901 W. Hively Avenue, Elkhart, Indiana 46517
Mailing Address:	1901 W. Hively Avenue, Elkhart, Indiana 46517
General Source Phone Number:	(574) 389-4018
SIC Code:	5561
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Source Specific Operating Agreement (SSOA) Not 1 of 28 Source Categories

A.2 Source Definition

- (a) Monaco Coach Co. (Monaco), source I.D. 039-00182, has several buildings at its Elkhart source. Monaco is leasing two of its buildings, 4 and 9, to Turning Wheel Holdings, Inc. (Turning Wheel). Turning Wheel will operate a recreational vehicle dealership and repair service. Monaco, though currently shutdown, is a recreational vehicle manufacturer. IDEM, OAQ has examined whether Monaco and Turning Wheel are part of the same major source. The term "major source" is must meet all three of the following criteria:
- (1) the businesses must be under common ownership or common control;
 - (2) the businesses must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
 - (3) the businesses must be located on contiguous or adjacent properties.
- (b) Monaco continues to own buildings 4 and 9, the paint spray booths and their associated equipment. Turning Wheel owns all the other business equipment. Turning Wheel and Monaco are separate corporate entities with no common ownership. Since there is no common ownership or control of the two businesses, the first element of the definition of major source is not met.
- (c) The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business, called establishments. The SIC Codes are divided up into eleven divisions, lettered A through K. Each division is broken down into separate major groups. Each major group has a distinct two-digit SIC Code. The manual states that establishments "which can be classified in a division should be classified in the most appropriate industry within that division." Monaco has the two-digit SIC code, 37, for the major group Transportation Equipment, which includes the four-digit SIC Code of 3716 for establishments that manufacture self-contained motor homes. Turning Wheel has the two-digit SIC Code of 55 for the major group Automotive Dealers and Gasoline Service Stations, which includes the four-digit SIC Code of 5561 for establishments that sell new and used motor homes, recreational trailers and campers. IDEM, OAQ finds that the two businesses do not have the same two-digit SIC code.

- (d) A business is considered a support facility if at least fifty percent of its output is dedicated to another business. Neither business will supply any output to the other. Neither one qualifies as a support facility. Since they do not have the same two-digit SIC Code and there is no support facility relationship, they do not meet the second criteria of the definition.
- (e) The buildings for the two businesses are located on the same piece of property, meeting the third element of the definition. Since Monaco and Turning Wheel do not meet all three of the elements of the definition, IDEM, OAQ finds that they are not part of the same major source.

A.3 Source Summary

This stationary source consists of the following:

- (a) Surface Coating or Graphic Arts Operation [326 IAC 2-9-2.5]
- (b) External Combustion Sources [326 IAC 2-9-13]

A.4 SSOA Applicability [326 IAC 2-9-1]

- (a) This source, otherwise required to have a permit under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8, has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.
- (b) Pursuant to 326 IAC 2-9-1(g), the source may apply for up to four (4) different SSOAs contained in 326 IAC 2-9.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this SSOA 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 2-1.1-1) shall prevail.

B.2 Enforceability

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.3 Severability

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.4 Property Rights or Exclusive Privilege

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

B.5 Duty to Provide Information

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

- (a) All terms and conditions of permits established prior to SSOA No. 039-27307-00687 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.7 Annual Notification [326 IAC 2-9-1(d)]

Pursuant to 326 IAC 2-9-1(d):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this SSOA.
- (b) The annual notice shall be submitted in the format attached no later than January 30 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

- (c) The notification 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.

B.8 Source Modification Requirement [326 IAC 2-9-1(e)]

Pursuant to 326 IAC 2-9-1(e), any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the Office of Air Quality (OAQ) under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted 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.10 Permit Revocation [326 IAC 2-1.1-9] [326 IAC 2-9-1(j)]

- (a) Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:
- (1) Violation of any conditions of this permit.
- (2) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (3) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (4) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (5) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.
- (b) Pursuant to 326 IAC 2-9-1(j), noncompliance with any applicable provision 326 IAC 2-9 or any requirement contained in this SSOA may result in the revocation of this SSOA and make this source subject to the applicable requirements of a major source.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-9]

C.1 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 SSOA:

- (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.2 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).

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

C.3 Compliance with Applicable Requirements [326 IAC 2-9-1(i)]

Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the Permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63.

Record Keeping and Reporting Requirements [326 IAC 2-9]

C.4 General Record Keeping Requirements [326 IAC 2-9-1(f)]

Pursuant to 326 IAC 2-9-1(f), records of all required monitoring data, reports and support information required by this SSOA shall be physically present or electronically accessible at the source location for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.5 Reporting Requirements [326 IAC 2-9-1(h)]

Pursuant to 326 IAC 2-9-1(h), any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.

SECTION D

OPERATION CONDITIONS

Operation Description: Surface Coating or Graphic Arts Operation [326 IAC 2-9-2.5]

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

Emission Limitations and Standards [326 IAC 2-9]

D.1 Volatile Organic Compounds and Hazardous Air Pollutants Limits [326 IAC 2-9-2.5(b)(2)(B)]

Pursuant to 326 IAC 2-9-2.5(b)(2)(B), the total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP), as supplied, delivered to the surface coating operation shall not exceed the following:

- (a) the total amount of VOC shall not exceed two (2) tons per month,
- (b) the total amount of any single HAP shall not exceed eight hundred thirty-three (833) pounds per month, and
- (c) the total amount of any combination of HAP shall not exceed one (1) ton per month.

D.2 Particulate [326 IAC 2-9-2.5(b)(5)]

Pursuant to 326 IAC 2-9-2.5(b)(5), particulate matter emissions shall be controlled by a dry filter system or an equivalent control device. The source shall operate the particulate control device at all times the surface coating operation is in operation in accordance with the manufacturer's specifications. A source shall be considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.

Record Keeping and Reporting Requirements [326 IAC 2-9]

D.3 Record Keeping Requirements [326 IAC 2-9-2.5(b)(3)]

Pursuant to 326 IAC 2-9-2.5(b)(3), the source shall keep the following records of the surface coating operation:

- (a) the number of gallons of each solvent containing material used,
- (b) the VOC and HAP content (pounds per gallon, as supplied) of each solvent containing material used,
- (c) material safety data sheets (MSDS) for each solvent containing material used,
- (d) a monthly summation of VOC and HAP usage, and
- (e) purchase orders and invoices for each solvent containing material used.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.4 Reporting Requirements [326 IAC 2-9-2.5(b)(6)]

Pursuant to 326 IAC 2-9-2.5(b)(6), the Permittee shall include with the annual notice required in Section B - Annual Notification, an inventory listing of the monthly volatile organic compound (VOC) and hazardous air pollutant (HAP) totals, and the total VOC and HAP emissions for the previous twelve (12) months.

SECTION E

OPERATION CONDITIONS

Operation Description: External Combustion Sources [326 IAC 2-9-13]

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

Emission Limitations and Standards [326 IAC 2-9]

E.1 External Combustion Sources Limitations [326 IAC 2-9-13(b)(2)(A)] [326 IAC 2-9-13(c)]

- (a) Pursuant to 326 IAC 2-9-13(b)(2)(A), the fuel usage for the external combustion units at this source shall be limited to less than one thousand million cubic feet (1000 MMcf) of natural gas per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-9-13(c), sources must be able to demonstrate compliance no later than thirty (30) days after receipt of a written request by IDEM, OAQ, or U.S. EPA. No other demonstration of compliance shall be required. A source specific operating agreement is not required for these sources.

E.2 Opacity [326 IAC 2-9-13(b)(1)]

Pursuant to 326 IAC 2-9-13(b)(1), the visible emissions from the source shall not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**SOURCE SPECIFIC OPERATING AGREEMENT (SSOA)
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-9.

Company Name:	Turning Wheel RV Center
Address:	1901 W. Hively Avenue
City:	Elkhart, Indiana 46517
Phone #:	(574) 389-4018
SSOA #:	039-27307-00687

I hereby certify that Turning Wheel RV Center is:

still in operation.

I hereby certify that Turning Wheel RV Center is:

no longer in operation.

in compliance with the requirements
of SSOA 039-27307-00687.

not in compliance with the requirements
of SSOA 039-27307-00687.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

