



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
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TO: Interested Parties / Applicant

DATE: November 1, 2011

RE: Goshen Coach & Marque McCoy Miller / 039-30375-00442

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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New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY

Goshen Coach & Marque McCoy Miller
25161 Leer Drive, and
1110 DI Drive
Elkhart, Indiana 46514

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.

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.

Operation Permit No.: F039-30375-00442	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 1, 2011 Expiration Date: November 1, 2016

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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 ambulance fabrication and assembly, and motorized bus manufacturing plant.

Source Address:	25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
General Source Phone Number:	574-970-6300
SIC Code:	3713 (Motor Vehicle Parts and Accessories)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 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:

Plant 1: 25161 Leer Drive, Elkhart, IN

(a) Laminating Operation:

- (1) One (1) panel laminating operation, constructed in 2005, consisting of two (2) laminating machines, designated as LD1 and LD2, for the lamination of door, roof, and sidewall frames using a urethane adhesive at a total material usage rate of 32.71 pounds of adhesive per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.
- (2) One (1) panel laminating clean up operation, designated LD1 and LD2, constructed in 2005, utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.

(b) One (1) Priming booth, designated as PB1, constructed in 2005, consisting of one (1) High Volume Low Pressure (HVLV) spray gun for application of a primer surface coating to metal floor frames at a maximum capacity of 1.15 bus frames per hour, controlled by dry filter, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S1;

(c) One (1) bus assembly operation, constructed in 2005, consisting of two assembly lines, designated as AL1 and AL2, with a total maximum capacity of 1.15 buses per hour, consisting of the following:

- (1) Two (2) adhesive applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an adhesive surface coating to wood and rubber surfaces, and venting to the indoors;

- (2) Hand application of caulks, sealants, adhesives, and aerosol application of primer and silicone to plastic, metal, rubber, and/or wood surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (d) One (1) undercoating and foam application operation, designated as UFBLD, constructed in 2005, with a maximum capacity of 1.15 buses per hour, consisting of the following:
 - (1) Two (2) undercoating applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an undercoating surface coating to metal surfaces, and venting to the indoors.
 - (2) Two (2) urethane foam flow applicators, constructed in 2005, to inject foam into the underside of buses, and venting to the indoors.
 - (3) Cleanup of the undercoating applicators and foam flow applicators utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (e) One (1) final finish operation, designated as FF, constructed in 2005, with a maximum capacity of 1.15 buses per hour, utilizing hand or soak application of non-halogenated organic solvent cleaners and degreasers to plastic, vinyl, and/or glass surfaces, and venting to the indoors.
- (f) One (1) paint touchup booth, designated as TB1, constructed in 2005, consisting of two (2) airless spray guns for application of basecoat and clearcoat surface coatings to plastic at a maximum capacity of 1.15 bus frames per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S2.
- (g) Ambulance Assembly Shop:
 - (1) One (1) ambulance assembly shop, identified as MMA, approved for construction in 2011, with 0.625 ambulances per hour, applying adhesives to wood and metal using aerosol and hand wiping operation, emissions uncontrolled, and exhausting to general ventilation.
 - (2) One (1) ambulance undercoating, identified as MMU, approved for construction in 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, with 0.625 ambulances per hour, emissions uncontrolled, and exhausting to general ventilation.
- (h) Wood Working Operation with a combined process weight rate of 166 pounds of lauan wood per hour and 460 pounds plywood per hour:
 - (1) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW1, with a total maximum throughput capacity of 83 pounds of lauan wood per hour and 230 pounds plywood per hour, with particulate emissions from WW1 controlled by one (1) baghouse dust collector, designated as DC1, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.
 - (2) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW2, with a total maximum throughput capacity of 83 pounds of lauan wood per hour and 230 pounds plywood per hour, with particulate emissions controlled by one (1) baghouse dust collector, designated as DC2, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.

Plant 2: 1110 DI Drive, Elkhart, IN

- (i) One (1) ambulance body shop/prime and paint booth, identified as MMP, approved for construction 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, 0.625 ambulances per hour, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4.

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:

Plant 1: 25161 Leer Drive, Elkhart, IN

- (j) One (1) welding and metal fabrication operation, designated as WMFD, constructed in 2005, which fabricates metal frames for motorized buses at a maximum capacity of 2,500 pounds of steel per hour and 500 pounds of aluminum per hour, venting to the indoors, and consisting of the following emission units:
 - (1) Twenty-five (25) metal inert gas (MIG) welding stations, constructed in 2005, each with a maximum wire usage rate of 1.0 pounds of wire per hour (GMAW Wire Type E70S).
 - (2) Two (2) stick welding stations, constructed in 2005, each with a maximum electrode usage rate of 0.125 pounds of electrode stick per hour (Electrode Type E5154).
 - (3) Twenty-five (25) tungsten inert gas (TIG) welding stations, constructed in 2005, each with a maximum wire usage rate of 1.0 pounds of wire per hour (GMAW Wire Type E70S).
 - (4) Four (4) oxyacetylene/electric arc flame cutting stations, designated at C1 through C4, constructed in 2005, each with a maximum metal thickness cut of 0.25 inches and a maximum metal cutting rate of 1.25 inches per minute.
 - (5) Degreasing operations utilizing hand application of a non-halogenated organic solvent.
 - (6) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (k) The following equipments, approved for construction in 2011, related to manufacturing activities for ambulances, not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Twenty-one (21) metal inert gas (MIG) welding stations, each with a maximum electrode consumption rate of 1.8154 lbs/hr, all exhausting inside the building.
 - (2) Three (3) TIG welding stations, each with a maximum wire usage rate of 1.8154 lbs/hr, exhausting inside the building.
 - (3) Three (3) plasma cutting stations, each with a maximum metal thickness cut of 0.375 inches and a maximum metal cutting rate of 150 inches per minute, exhausting inside the building.
- (l) Metal fabrication Shops with a total throughput of 2,500 lbs/hr:
 - (1) Eighteen (18) chop saws for cutting of metal, designated as CS1 through CS18, constructed in 2005, maximum process throughput of 1,500 pounds/ with no particulate control.

- (2) Two (2) miter saws for cutting of metal, designated as MS1 and MS2, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control.
- (3) Eight (8) band saws for cutting of metal, designated as BS1 through BS8, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control;
- (4) Four (4) drill presses for drilling of metal, designated as DP1 through DP4, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control.
- (m) Four (4) table saws for cutting of polystyrene foam insulation, designated as TS1 through TS4, maximum process throughput of 25 lbs/hr combined, constructed in 2005, with no particulate control.
- (n) One (1) ambulance carpenter shop, identified as MMC, approved for construction in 2011, with 0.625 ambulances per hour, using a cyclone to control particulate emissions, constructed in 1994, and exhausting to general ventilation.
- (o) Combustion Units:
 - (1) Two (2) natural gas-fired furnaces, designated as H1 and H2, constructed in 2005, each rated at 0.05 MMBtu/hr, exhausting through stacks H1 and H2, respectively.
 - (2) One (1) natural gas-fired air makeup unit, designated as H3, constructed in 2005, rated at 2.9 MMBtu/hr, venting to the indoors.
 - (3) Two (2) natural gas-fired furnaces, designated as H4 and H5, constructed in 2005, each rated at 0.105 MMBtu/hr, exhausting through stacks H4 and H5, respectively.
 - (4) two (2) natural gas-fired furnaces, designated as H6 and H7, constructed in 2005, each rated at 0.092 MMBtu/hr, exhausting through stacks H6 and H7, respectively.
 - (5) nineteen (19) natural gas-fired heaters, designated as H8 through H26, constructed in 2005, each rated at 0.105 MMBtu/hr, exhausting through stacks H8 through H26, respectively.
- (p) The following VOC and HAP storage containers, approved for construction in 2011:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (q) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings, approved for construction in 2011.
- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
- (s) Cleaners and solvents, approved for construction in 2011, characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

- (2) Having a vapor pressure equal to or less than 0.7 kPA; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

Plant 2: 1110 DI Drive, Elkhart, IN

- (t) Natural gas-fired Combustion units with heat input equal to or less than ten (10) million BTU per hour:
 - (A) Forty-one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu/hr.
 - (B) One (1) natural gas fired box heater rated at 0.15 MMBtu/hr.
 - (C) Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu/hr.
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (v) Paved and unpaved roads and parking lots with public access.

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

-
- (a) This permit, F039-30375-00442, 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, until the renewal permit has been issued or denied.

B.3 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.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(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.6 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.7 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

-
- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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.9 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 no later than April 15 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, 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.12 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 describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-30375-00442 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.14 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.15 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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that

meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.16 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 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.21 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.22 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 no later than 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.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 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

Emission 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) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) 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 that the source's potential to emit does not exceed the above specified limits.

(d) 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 5-1-1 (Applicability) and 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]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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; and/or
 - (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1: 25161 Leer Drive, Elkhart, IN

- (a) Laminating Operation:
 - (1) One (1) panel laminating operation, constructed in 2005, consisting of two (2) laminating machines, designated as LD1 and LD2, for the lamination of door, roof, and sidewall frames using a urethane adhesive at a total material usage rate of 32.71 pounds of adhesive per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.
 - (2) One (1) panel laminating clean up operation, designated LD1 and LD2, constructed in 2005, utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.
- (b) One (1) Priming booth, designated as PB1, constructed in 2005, consisting of one (1) High Volume Low Pressure (HVLP) spray gun for application of a primer surface coating to metal floor frames at a maximum capacity of 1.15 bus frames per hour, controlled by dry filter, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S1;
- (c) One (1) bus assembly operation, constructed in 2005, consisting of two assembly lines, designated as AL1 and AL2, with a total maximum capacity of 1.15 buses per hour, consisting of the following:
 - (1) Two (2) adhesive applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an adhesive surface coating to wood and rubber surfaces, and venting to the indoors;
 - (2) Hand application of caulks, sealants, adhesives, and aerosol application of primer and silicone to plastic, metal, rubber, and/or wood surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (d) One (1) undercoating and foam application operation, designated as UFBLD, constructed in 2005, with a maximum capacity of 1.15 buses per hour, consisting of the following:
 - (1) Two (2) undercoating applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an undercoating surface coating to metal surfaces, and venting to the indoors.
 - (2) Two (2) urethane foam flow applicators, constructed in 2005, to inject foam into the underside of buses, and venting to the indoors.
 - (3) Cleanup of the undercoating applicators and foam flow applicators utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (e) One (1) final finish operation, designated as FF, constructed in 2005, with a maximum capacity of 1.15 buses per hour, utilizing hand or soak application of non-halogenated organic solvent cleaners and degreasers to plastic, vinyl, and/or glass surfaces, and venting to the indoors.
- (f) One (1) paint touchup booth, designated as TB1, constructed in 2005, consisting of two (2)

airless spray guns for application of basecoat and clearcoat surface coatings to plastic at a maximum capacity of 1.15 bus frames per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S2.

(g) Ambulance Assembly Shop:

- (1) One (1) ambulance assembly shop, identified as MMA, approved for construction in 2011, with 0.625 ambulances per hour, applying adhesives to wood and metal using aerosol and hand wiping operation, emissions uncontrolled, and exhausting to general ventilation.
- (2) One (1) ambulance undercoating, identified as MMU, approved for construction in 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, with 0.625 ambulances per hour, emissions uncontrolled, and exhausting to general ventilation.

Plant 2: 1110 DI Drive, Elkhart, IN

- (i) One (1) ambulance body shop/prime and paint booth, identified as MMP, approved for construction in 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, 0.625 ambulances per hour, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4.

(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 2-8-4(1)]

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

The total VOC input (including clean up solvents) at the following operations shall be limited to less than 98.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

- (a) Panel Lamination Adhesive Application and cleanup LD1 and LD2,
- (b) Priming Booth PB1,
- (c) Bus Assembly operations AL1 and AL2,
- (d) Undercoating and Foam Application operation UFBLD,
- (e) Final Finish FF,
- (f) Paint Touch up Booth TB1,
- (g) Ambulance Assembly Shop MMA,
- (h) Ambulance Undercoating MMU, and
- (i) Ambulance body shop/prime and Paint booth MMP

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1]

- (1) The total usage of any single hazardous air pollutant (HAP) at the following operations shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

- (a) Panel Lamination Adhesive Application and cleanup LD1 and LD2,
 - (b) Priming Booth PB1,
 - (c) Bus Assembly operations AL1 and AL2,
 - (d) Undercoating and Foam Application operation UFBLD,
 - (e) Final Finish FF,
 - (f) Paint Touch up Booth TB1,
 - (g) Ambulance Assembly Shop MMA,
 - (h) Ambulance Undercoating MMU, and
 - (i) Ambulance body shop/prime and Paint booth MMP
- (2) The total usage of all hazardous air pollutants (HAPs) at the following operations shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:
- (a) Panel Lamination Adhesive Application and cleanup LD1 and LD2,
 - (b) Priming Booth PB1,
 - (c) Bus Assembly operations AL1 and AL2,
 - (d) Undercoating and Foam Application operation UFBLD,
 - (e) Final Finish FF,
 - (f) Paint Touch up Booth TB1,
 - (g) Ambulance Assembly Shop MMA,
 - (h) Ambulance Undercoating MMU, and
 - (i) Ambulance body shop/prime and Paint booth MMP

Compliance with the above limits, combined with the potential to emit single HAP, and combined HAPs from other emission units at the source, shall limit the single HAP and combined HAPs from the entire source to less than 10, and 25 tons per twelve (12) consecutive month period respectively, and render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major sources of Hazardous air Pollutants) not applicable.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal parts and Plastic Parts coating) no owner or operator of a facility engaged in the following metal surface coating operations, emitting VOC greater than 15 lbs/day before add on control, may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

Unit ID
Bus Assembly Operation AL1 and AL2 (Metal Coating only)
Priming Booth - PB1
Under Coating and Foam Application Operation- UFBLD
Ambulance Undercoating - MMU

- (1) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
 - (A) temperatures consistently above ninety-five (95) degrees Celsius;
 - (B) detergents;

- (C) abrasive or scouring agents;
- (D) solvents;
- (E) corrosive atmospheres;
- (F) outdoor weather at all times; or
- (G) similar environmental conditions.

D.1.4 Volatile Organic Compounds (VOC) Clean-up Requirements [(326 IAC 8-2-9)(f)]

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

- (a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the VOC input, including dilution and cleaning solvents and excluding materials otherwise regulated by 326 IAC 8-2, to the Bus Assembly Operation (AL1 and AL2), shall be limited to less than 25 tons of VOC input per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the VOC input, including dilution and cleaning solvents and excluding materials otherwise regulated by 326 IAC 8-2, to the Ambulance Body Shop/Prime and Paint Booth (MMP), shall be limited to less than 24.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall render 326 IAC 8-1-6 not applicable.

D.1.6 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from priming booth PB1, Bus Assembly Operation (AL1 and AL2), Undercoating and Foam Deadening Operation (UFBLD), and spray coating operation MMP shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(d), the spray under-coating operation (MMU) is subject to the following work practice standards:
 - (1) Operate the coating operation inside the building.

- (2) If accumulations of undercoating are observed on fans, stacks or on the ground outside the plant; then overspray controls must be installed.
- (3) Maintain and operate the undercoating equipment according to the manufacturer's recommendations.

D.1.7 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section - B, Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3, D.1.4 and 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 data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.3, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed for Priming booth PB1 at Plant 1 and ambulance body shop/prime and paint booths MMP at Plant 2 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 booths MMP, stacks (SV-2 and SV-4) and Priming booth PB1, stack S1 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable

response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirement

-
- (a) To document the compliance status with Conditions D.1.1, D.1.2 D.1.3, D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.1.1, D.1.2, D.1.3 and D.1.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent 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.
 - (C) In the event only a single coating is used, MSDS sheets or manufacturer's information would suffice to demonstrate compliance with D.1.3 in lieu of tracking the amount of coating material.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC, single HAP, and combined HAPs usage for each month;
 - (5) The weight of VOCs, and HAPs emitted for each compliance period; and
 - (6) Monthly inventory records necessary to verify the type and amount used.
 - (7) The volume weighted average VOC content of the coatings used each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.3, then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance status with Conditions D.1.1, D.1.2, D.1.5 (b) and D.1.5 (c) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Wood Working Operation with a combined process weight rate of 166 pounds of lauan wood per hour and 460 pounds plywood per hour:
- (1) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW1, with a total maximum throughput capacity of 83 pounds of lauan wood per hour and 230 pounds plywood per hour, with particulate emissions from WW1 controlled by one (1) baghouse dust collector, DC1, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.
 - (2) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW2, with a total maximum throughput capacity of 83 pounds of lauan wood per hour and 230 pounds plywood per hour, with particulate emissions from WW2 controlled by one (1) baghouse dust collector, DC2, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.

Insignificant emission unit:

- (n) One (1) ambulance carpenter shop, identified as MMC, approved for construction in 2011, with 0.625 ambulances per hour, using a cyclone to control particulate emissions, and exhausting to general ventilation.

(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 2-8-4]

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operation (WW1) shall not exceed 0.94 pounds per hour based on a process weight rate equal to 313 pounds of wood per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operation (WW2) shall not exceed 0.94 pounds per hour based on a process weight rate equal to 313 pounds of wood per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the ambulance carpenter shop (MMC) shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour:

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1(a) and (b), the integral baghouses DC1 and DC2 shall be in operation and control emissions from portable table saws WW1 and WW2 respectively, at all times that table saw WW1 and WW2 are in operation.
- (b) In order to comply with Condition D.2.1(c), the integral cyclone for particulate control shall be in operation and control emissions from the ambulance carpenter shop, at all times the wood working facility is in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

D.2.5 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature,

flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation.

D.2.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4]

D.2.8 Record Keeping Requirements

To document the compliance status with Conditions D.2.4 and D.2.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.4 and D.2.6.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Goshen Coach & Marque McCoy Miller
Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
FESOP Permit No.: F039-30375-00442

**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 AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: Goshen Coach & Marque McCoy Miller
Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
FESOP Permit No.: F039-30375-00442

This form consists of 2 pages

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<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 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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: _____

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

FESOP Quarterly Report

Source Name: Goshen Coach & Marque McCoy Miller
Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
FESOP Permit No.: F039-30375-00442
Facility: Bus Assembly Operation (AL1 and AL2)
Pollutant: VOC
Limit: Less than 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
	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: _____

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

FESOP Quarterly Report

Source Name: Goshen Coach & Marque McCoy Miller
Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
FESOP Permit No.: F039-30375-00442
Facility: Ambulance body shop/prime and paint booth (MMP)
Parameter: VOC usage
Limit: Less than 24.8 tons per twelve (12) Consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

FESOP Quarterly Report

Source Name: Goshen Coach & Marque McCoy Miller
 Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
 FESOP Permit No.: F039-30375-00442
 Parameter: VOC, single and combined HAPs usages

- Limit: (a) total VOC usage at the Panel laminating Cleanup LD1 and LD2, Priming Booth PB1, Assembly operation AI1 and AL2, Undercoating and Foam application UFBLD, Final Finish FF, Touch up Booth TB1, Ambulance Assembly shop MMA, Ambulance Undercoating MMU, and shop/Prime and Paint booths MMP, including but not limited to the usage of sealants, bonding materials, adhesives, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 98.0 tons per twelve (12) consecutive month period.
- (b) total usage of any single hazardous air pollutant (HAP) at the Panel laminating Cleanup LD1 and LD2, Priming Booth PB1, Assembly operation AI1 and AL2, Undercoating and Foam application UFBLD, Final Finish FF, Touch up Booth TB1, Ambulance Assembly shop MMA, Ambulance Undercoating MMU, and shop/Prime and Paint booths MMP shall be limited to less than 9.0 tons per twelve (12) consecutive month period.
- (c) combined usage of all hazardous air pollutants (HAPs) at the Panel laminating Cleanup LD1 and LD2, Priming Booth PB1, Assembly operation AI1 and AL2, Undercoating and Foam application UFBLD, Final Finish FF, Touch up Booth TB1, Ambulance Assembly shop MMA, Ambulance Undercoating MMU, and shop/Prime and Paint booths MMP shall be limited to less than 24.0 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

* List the single HAP with the greatest emission rate

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Goshen Coach & Marque McCoy Miller
Source Address: 25161 Leer Drive, and 1110 DI Drive, Elkhart, Indiana 46514
FESOP Permit No.: F039-30375-00442

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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: _____

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

**Technical Support Document (TSD) for a Minor Source Operating Permit
Transitioning to a Federally Enforceable State Operating Permit (FESOP) with New
Source Review (NSR)**

Source Background and Description

Source Name:	Goshen Coach & Marque McCoy Miller
Source Location:	25161 Leer Drive, Elkhart, IN 46514 & 1110 DI Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3713 (Motor Vehicle Parts and Accessories)
Application No.:	039-30375-00442
Reviewer:	Swarna Prabha

On March 25, 2011 the Office of Air Quality (OAQ) received an application from Goshen Coach & Marque McCoy Miller, formerly known as Goshen Coach, Inc., located at 25161 Leer Drive, Elkhart, IN 46514, related to the consolidation of the management of SJC Industries Corp., dba Marque and McCoy Miller, located at 1110, DI Drive, Elkhart, IN 46514. As a part of this consolidation some of the existing SJC plant's ambulance assembly equipment is relocating to the Goshen Coach, Inc. plant. The SJC Industries Corp. painting operation will remain at its current location. Due to the consolidation of the emission units from SJC Industries Corp. dba as Marque McCoy Miller, the Goshen Coach & Marque McCoy Miller is transitioning from a MSOP to a FESOP. The incorporation of the operation previously permitted under SJC Industries into Goshen Coach will be considered as new source review.

Source Definition

This source consists of the following plants:

- (a) Plant 1:
Goshen Coach, Inc. is located at 25161 Leer Drive, Elkhart, IN 46514; Plant ID: 039-00442; and
- (b) Plant 2:
SJC Industries Corp., dba Marque McCoy Miller is located at 1110 DI Drive, Elkhart, IN 46514; Plant ID: 039-00508.

In order to consider both plants as one single source, all three of the following criteria must be met:

The parent company known as Thor Industries, Inc. has consolidated the management of Goshen Coach, Inc. and SJC Industries Corp., dba Marque and McCoy Miller. As part of the consolidation, Thor Industries, Inc. will be moving some of the SJC plant's ambulance assembly equipment to the same property as Thor's Goshen Coach plant, though in a separate building. Goshen Coach produces buses. The SJC plant produces ambulances. The SJC painting operation will remain at its current location, approximately 1.9 miles away from the Goshen Coach/SJC site, and will paint the buses and ambulances produced at the Goshen Coach/SJC site. IDEM, OAQ has examined whether the current Goshen Coach plant, the new SJC assembly plant and the SJC painting operation will be part of the same major source. The term "major source" is defined at 326 IAC 2-7-1 (22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;

- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other(s); and,
- (3) the plants must be located on one or more contiguous or adjacent properties.

All three plants are owned by the same parent company, Thor Industries, Inc. IDEM's nonrule policy document Air-005 states that if the plants are owned by the same person or entity, common control exists. In this case, Thor Industries, Inc. owns 100% of each plant. Since common ownership and common control exist, the first part of the major source definition is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the internet. The current Goshen Coach plant, the new SJC assembly plant and the SJC painting operation have the two-digit SIC Code 37, for the Major Group Transportation Equipment.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Each plant will have separate employees and separate plant managers. The current Goshen Coach plant will not provide any output to the new SJC ambulance plant. The new SJC ambulance plant will not provide any output to the current Goshen Coach Plant. The current Goshen Coach plant and the new SJC ambulance plant will send all their assembled vehicles to the SJC painting operation to be painted. The SJC painting operation will paint a skirting stripe on each Goshen Coach bus and will completely paint each SJC ambulance. More than 50% of the SJC painting operation's output will be dedicated to painting SJC ambulances. Therefore, the SJC painting operation will be a support facility for the new SJC ambulance plant. It will not be a support facility to the Goshen Coach plant, since it will dedicate less than 50% of its painting to that plant. Since all three plants have the same two-digit SIC Code the plants meet the second part of the major source definition.

The Goshen Coach and SJC ambulance plants will be located in separate buildings on the same property. Since those two assembly plants are located on one property, they meet the third part of the major source definition. The SJC painting operation will be located about 1.9 miles away. Since the SJC painting operation is not on a contiguous property, IDEM examined whether the SJC painting operation is on an adjacent property.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality regarding the term "adjacent". This letter is in no way binding on IDEM, OAQ, but it is persuasive. Region VIII stated that any evaluation of what is "adjacent" must relate the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

The buses and ambulances will be routinely transferred from the Goshen Coach/SJC site to be painted at the SJC painting operation. The plants will have separate managers and separate production staff. The production process itself will split between the plants, with the production of vehicles the Goshen Coach/SJC site, the transfer of each vehicle to the SJC painting operation for new paint and the return of each vehicle back to the Goshen Coach/SJC site. The plants are close enough to enable them to operate as one source, as illustrated by the split production process and the routine transferring of vehicles. The plants are therefore adjacent, meeting the third part of the major source definition.

Since the Goshen Coach plant, the SJC ambulance plant and the SJC painting operation meet all three parts

of the definition, IDEM, OAQ has determined that the three plants are part of the same major source.

The combined source will be issued one FESOP. The term “source” refers to both Goshen Coach and SJC as one source, now known as Goshen Coach & Marque McCoy Miller. For administrative tracking purpose, the source will be permitted under Plant ID 039-00442.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Goshen Coach, Inc.:
 - (a) MSOP First Renewal No.: 039-29115-00442, issued on August 27, 2010.

Due to this application, the source is transitioning from a MSOP to a FESOP.

- (2) SJC Industries Corp., dba Marque and McCoy Miller:
 - (a) FESOP No.: 039-25492-00508, issued on March 12, 2008

This FESOP will be incorporated and superseded by FESOP 039-30375-000442.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is

revised.

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

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has received an application from Goshen Coach & Marque McCoy Miller, on March 25, 2011, requesting a transition from their existing MSOP permit No.: 039-29115-00442, issued on August 27, 2010 to a FESOP. Due to the management consolidation, the existing SJC Industries Corp., dba Marque and McCoy Miller will relocate its ambulance assembly equipments, under coating operations and insignificant emission units (storage tanks, oil grease and lubrication operations, and welding operations) to the site currently occupied by Goshen Coach & Marque McCoy Miller Plant 1. The Office of Air Quality (OAQ) has reviewed this application and, although the potential emissions exceed the Title V thresholds, actual emissions are below these levels and the source has requested to limit the source wide emissions to FESOP levels.

Plant 1: 25161 Leer Drive, Elkhart, IN

The source consists of the following permitted and new emission units:

- (a) Laminating Operation:
- (1) One (1) panel laminating operation, constructed in 2005, consisting of two (2) laminating machines, designated as LD1 and LD2, for the lamination of door, roof, and sidewall frames using a urethane adhesive at a total material usage rate of 32.71 pounds of adhesive per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.
 - (2) One (1) panel laminating clean up operation, designated LD1 and LD2, constructed in 2005, utilizing hand or soak application of a non-halogenated organic solvent, venting to the indoors.
- (b) One (1) Priming booth, designated as PB1, constructed in 2005, consisting of one (1) High Volume Low Pressure (HVLV) spray gun for application of a primer surface coating to metal floor frames at a maximum capacity of 1.15 bus frames per hour, controlled by dry filter, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S1;
- (c) One (1) bus assembly operation, constructed in 2005, consisting of two assembly lines, designated as AL1 and AL2, with a total maximum capacity of 1.15 buses per hour, consisting of the following:
- (1) Two (2) adhesive applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an adhesive surface coating to wood and rubber surfaces, and venting to the indoors;
 - (2) Hand application of caulks, sealants, adhesives, and aerosol application of primer and silicone to plastic, metal, rubber, and/or wood surfaces, with cleanup operations utilizing

hand or soak application of a non-halogenated organic solvent, and venting to the indoors.

- (d) One (1) undercoating and foam application operation, designated as UFBLD, constructed in 2005, with a maximum capacity of 1.15 buses per hour, consisting of the following:
 - (1) Two (2) undercoating applicators, constructed in 2005, utilizing low pressure, non-atomizing flow coating to apply an undercoating surface coating to metal surfaces, and venting to the indoors.
 - (2) Two (2) urethane foam flow applicators, constructed in 2005, to inject foam into the underside of buses, and venting to the indoors.
 - (3) Cleanup of the undercoating applicators and foam flow applicators utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors.
- (e) One (1) final finish operation, designated as FF, constructed in 2005, with a maximum capacity of 1.15 buses per hour, utilizing hand or soak application of non-halogenated organic solvent cleaners and degreasers to plastic, vinyl, and/or glass surfaces, and venting to the indoors.
- (f) One (1) paint touchup booth, designated as TB1, constructed in 2005, consisting of two (2) airless spray guns for application of basecoat and clearcoat surface coatings to plastic at a maximum capacity of 1.15 bus frames per hour, and with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and exhausting through stack S2.
- (g) Ambulance Assembly Shop:
 - (1) One (1) ambulance assembly shop, identified as MMA, approved for construction in 2011, with 0.625 ambulances per hour, applying adhesives to wood and metal using aerosol and hand wiping operation, emissions uncontrolled, and exhausting to general ventilation. This is a Title1 change.
 - (2) One (1) ambulance undercoating, identified as MMU, approved for construction in 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, with 0.625 ambulances per hour, emissions uncontrolled, and exhausting to general ventilation. This is a Title1 change.

NOTE: These emission units were originally located at Plant 2: 1110 DI Drive, Elkhart, IN and now relocating to Plant 1: 25161 Leer Drive, Elkhart, IN. These units are considered as new emission units in terms of permitting them under the new one source.

- (h) Wood Working Operation with a combined process weight rate of 166 pounds of lauan wood per hour and 460 pounds plywood per hour:
 - (1) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW1, with a total maximum throughput capacity of 166 pounds of lauan wood per hour and 460 pounds plywood per hour, with particulate emissions from WW1 controlled by one (1) baghouse dust collector, designated as DC1, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.
 - (2) One (1) portable woodworking operation, constructed in 2005, consisting of one (1) table saw for cutting of wood, designated as WW2, with a total maximum throughput capacity of 166 pounds of lauan wood per hour and 460 pounds plywood per hour, with particulate emissions controlled by one (1) baghouse dust collector, designated as DC2, and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when

operated at a maximum gas flow rate of one thousand five hundred (1,500) actual cubic feet per minute.

Plant 2: 1110 DI Drive, Elkhart, IN

- (i) One (1) ambulance body shop/prime and paint booth, identified as MMP, approved for construction in 2011, consisting of one (1) high volume low pressure spray gun for applying coatings to metal, 0.625 ambulances per hour, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4. This is a Title1 change.

Note: This operation is considered as new emission unit in terms of permitting the source under the new one source.

Insignificant Activities

Plant 1: 25161 Leer Drive, source consists of the following insignificant permitted emission units:

- (j) One (1) welding and metal fabrication operation, designated as WMFD, constructed in 2005, which fabricates metal frames for motorized buses at a maximum capacity of 2,500 pounds of steel per hour and 500 pounds of aluminum per hour, venting to the indoors, and consisting of the following emission units:
- (1) Twenty-five (25) metal inert gas (MIG) welding stations, constructed in 2005, each with a maximum wire usage rate of 1.0 pounds of wire per hour (GMAW Wire Type E70S).
 - (2) Two (2) stick welding stations, constructed in 2005, each with a maximum electrode usage rate of 0.125 pounds of electrode stick per hour (Electrode Type E5154).
 - (3) Twenty-five (25) tungsten inert gas (TIG) welding stations, constructed in 2005, each with a maximum wire usage rate of 1.0 pounds of wire per hour (GMAW Wire Type E70S).
 - (4) Four (4) oxyacetylene/electric arc flame cutting stations, designated at C1 through C4, constructed in 2005, each with a maximum metal thickness cut of 0.25 inches and a maximum metal cutting rate of 1.25 inches per minute.
 - (5) Degreasing operations utilizing hand application of a non-halogenated organic solvent.
 - (6) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (k) Metal fabrication Shops with a total throughput of 3,000 lbs/hr:
- (1) Eighteen (18) chop saws for cutting of metal, designated as CS1 through CS18, constructed in 2005, maximum process throughput of 1,500 pounds/ with no particulate control.
 - (2) Two (2) miter saws for cutting of metal, designated as MS1 and MS2, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control.
 - (3) Eight (8) band saws for cutting of metal, designated as BS1 through BS8, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control.
 - (4) Four (4) drill presses for drilling of metal, designated as DP1 through DP4, constructed in 2005, maximum process throughput of 500 lbs/hr combined, with no particulate control.

- (l) The following equipments, approved for construction in 2011, related to manufacturing activities for ambulances, not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Twenty-one (21) metal inert gas (MIG) welding stations, each with a maximum electrode consumption rate of 1.8154 lbs/hr, all exhausting inside the building.
 - (2) Three (3) TIG welding stations, each with a maximum wire usage rate of 1.8154 lbs/hr, exhausting inside the building.
 - (3) Three (3) plasma cutting stations, each with a maximum metal thickness cut of 0.375 inches and a maximum metal cutting rate of 150 inches per minute, exhausting inside the building
- (m) Four (4) table saws for cutting of polystyrene foam insulation, designated as TS1 through TS4, constructed in 2005, maximum process throughput of 25 lbs/hr combined, with no particulate control.
- (n) One (1) ambulance carpenter shop, identified as MMC, approved for construction in 2011, with 0.625 ambulance per hour, using a cyclone to control particulate emissions, and exhausting to general ventilation.

NOTE: the emissions are less than 5 lbs/hr particulates from this unit.

- (o) Combustion Units:
 - (1) Two (2) natural gas-fired furnaces, designated as H1 and H2, constructed in 2005, each rated at 0.05 MMBtu/hr, exhausting through stacks H1 and H2, respectively.
 - (2) One (1) natural gas-fired air makeup unit, designated as H3, constructed in 2005, rated at 2.9 MMBtu/hr, venting to the indoors.
 - (3) Two (2) natural gas-fired furnaces, designated as H4 and H5, constructed in 2005, each rated at 0.105 MMBtu/hr, exhausting through stacks H4 and H5, respectively.
 - (4) two (2) natural gas-fired furnaces, designated as H6 and H7, constructed in 2005, each rated at 0.092 MMBtu/hr, exhausting through stacks H6 and H7, respectively.
 - (5) nineteen (19) natural gas-fired heaters, designated as H8 through H26, constructed in 2005, each rated at 0.105 MMBtu/hr, exhausting through stacks H8 through H26, respectively.
- (p) The VOC and HAP storage containers, approved for construction in 2011:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (q) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings, approved for construction in 2011.
- (r) Cleaners and solvents, approved for construction in 2011, characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

- (2) Having a vapor pressure equal to or less than 0.7 kPA; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

Plant 2: 1110 DI Drive, Elkhart, IN

- (s) Natural gas-fired Combustion existing units with heat input equal to or less than ten (10) million BTU per hour:
 - (A) Forty-one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu/hr.
 - (B) One (1) natural gas fired box heater rated at 0.15 MMBtu/hr.
 - (C) Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu/hr.
- (t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (u) Paved and unpaved roads and parking lots with public access.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted units.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

Unrestricted Potential Emissions

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Less than 100
PM ₁₀	Less than 100
PM _{2.5}	Less than 100

Unrestricted Potential Emissions	
Pollutant	Tons/year
SO ₂	Less than 100
VOC	Greater than 100, less than 250
CO	Less than 25
NO _x	Less than 25
GHGs as CO ₂ e	Less than 100,000
Single HAP	Greater than 10 (Toluene)
Total HAP	Greater than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally 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.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} ***	SO ₂	NO _x	VOC	CO	**GHGs as CO ₂ e	Total HAPs	Worst Single HAP
25161 Leer Drive										
Panel Lamination Adhesive Application LD1 and LD2	0	0	0	0	0	(a1)	0	0	(b1)	(c1)
Panel Laminating Cleanup LD1 and LD2	0	0	0	0	0		0			
****Priming Booth (PB1)	8.85	8.85	8.85	0	0		0	0		
Assembly Operations (AL1 and AL2) *****	1.17	1.17	1.17	0	0		0	0		
Undercoating and Cleanup (UFBLD)	0	0	0	0	0		0	0		
Final Finish (FF)	0.16	0.16	0.16	0	0		0	0		
****Touchup Booth (TB1)	0.82	0.82	0.82	0	0		0	0		
Ambulance Assembly (MMA)	0.81	0.81	0.81	0	0		0	0		
Ambulance Undercoating (MMU)	5.39	5.39	5.39	0	0	0	0	0	0	
Ambulance carpenter shop (MMC)	0.16	0.16	0.16	0	0	0	0	0	0	0
Woodworking (WW1 and WW2)	0.23	0.23	0.23	0	0	0	0	0	0	0
Insignificant Activities										
Welding & Flame Cutting (WMFD)	1.24	1.24	1.24	0	0	0	0	0	0.70	0
Welding Degreasing	0	0	0	0	0	0.10	0	0	negl.	negl.
Welding & Thermal cutting	1.89	1.89	1.89	0	0	0	0	0	0.95	0
Miscellaneous Metal fabrication	4.56	4.56	4.56	0	0	0	0	0	0	0
Natural Gas Combustion	0.04	0.18	0.13	0.014	2.36	0.13	1.98	2,849.70	negl.	negl.
1110 DI Drive										
Ambulance Body Shop/Prime and Paint Booth (MMP) *****	24.19	24.19	24.19	0	0	(a2)	0	0	(b2)	(c2)
Insignificant -Natural Gas Combustion	0.04	0.17	0.017	0.014	2.24	0.12	1.88	2,707.45	0.041	negl.
Total PTE of Entire Source	49.57	49.83	49.83	0.028	4.60	<100.0	3.87	5,557.15	<25.0	<10.0 (Toluene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

**The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

***PM_{2.5} listed is direct PM_{2.5}.

(a1+a2) -Limited VOC to comply with FESOP limit 326 IAC 2-8-4 < 98.0 tons/yr.

(c1+c2) - Limited single HAP to comply with FESOP limits 326 IAC 2-8-4 < 9.0 tons/yr.

(b1 +b2) - Limited Combined HAPs to comply with FESOP limits 326 IAC 2-8-4 <24.0 tons/yr.

****Represents Potential to emit particulates before controls, actual emissions will be less because they are controlled by dry filters.

***** Each is limited to less than 25 tons per year of VOC to render 326 IAC 8-1-6 not applicable.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria

pollutants from the entire source will be limited to less than the Title V major source threshold levels.

In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) VOC Limitations:

The total amount of VOC usage at the Panel Lamination Adhesive Application and cleanup units LD1 and LD2, Priming Booth PB1, assembly operations AL1, AL2, undercoating and cleanup UFBLD, final Finish FF, Touch up Booth TB1, Ambulance Assembly MMA, and Ambulance Undercoating MMU, shop/and Paint booth MMP, and plus the amount of VOCs used for clean-up solvents, shall be limited to less than 98.0 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

(2) HAPs limitations

(A) The total usage of any single hazardous air pollutant (HAP) at the Panel Lamination Adhesive Application and cleanup LD1 and LD2, Priming Booth PB1, assembly operations AL1, AL2, undercoating and cleanup UFBLD, final Finish FF, Touch up Booth TB1, Ambulance Assembly MMA, and Ambulance Undercoating MMU, shop/and Paint booths MMP, and plus the amount of VOCs used for clean-up solvents shall be limited to less than 9.0 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(B) The total usage of all hazardous air pollutants (HAPs) Panel Lamination Adhesive Application and cleanup LD1 and LD2, Priming Booth PB1, assembly operations AL1, AL2, undercoating and cleanup UFBLD, final Finish FF, Touch up Booth TB1, Ambulance Assembly MMA, and Ambulance Undercoating MMU, shop/and Paint booths MMP, and plus the amount of VOCs used for clean-up solvents units shall be limited to less than 24.0 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25.0 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit single HAP, and combined HAPs from other emission units at the source, shall limit the single HAP and combined HAPs from the entire source to less than 10, and 25 tons per twelve (12) consecutive month period respectively, and render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major sources of Hazardous air Pollutants not applicable). This is a Title1 change.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all criteria pollutants are less than 250 tons per year, the potential to emit all (other)

attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for (NSPS), 40 CFR 60, Subpart MM, Automobile and Light Duty Truck Surface Coating Operations (40 CFR Parts 60.390 - 60.398) (326 IAC 12), are not included in the permit, since this source is not a major source for HAPs as defined in 40 CFR 63.2 and is not involved in the surface coating of automobiles or light duty trucks. This source assembles motorized buses, and does not fit under the definition of automobile or light-duty truck. The provisions of Subpart MM are not included in the permit.
- (b) The insignificant activities identified as storage tanks, with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons, are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 75 cubic meters (19,813 gallons)).
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) This source is not subject to the requirements of the 40 CFR Subpart T (63.460 through 63.470), NESHAP for Halogenated Solvent Cleaning, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR Part 63.800 - 63.808) (326 IAC 20-14-1), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not manufacture wood furniture or wood furniture components.
- (c) This source is not subject to the requirements of 40 CFR 63 Subpart III (63.1290 through 63.1309) - NESHAPs: Flexible Polyurethane Foam Production (326 IAC 20-22-1), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII, Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080 - 63.3176), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not surface coat automobiles or light duty trucks as defined by 63.3176. This source assembles motorized buses and ambulances.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart PPPP, Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480 - 63.4581), because the source is not a major source of HAPs as defined in

40 CFR 63.2.

- (g) This source is not subject to the requirements of 40 CFR 63 Subpart M (63.8780 through 63.8830) - NESHAPs: Flexible Polyurethane Foam Fabrication Operation (326 IAC 20-66-1), because this source does not perform fabrication of flexible polyurethane foam as defined by 40 CFR 63.8782.
- (h) This source is not subject to the requirements of 40 CFR 63 Subpart H (63.11169-through 63.11180 and Table 1) - NESHAPs: Paint Stripping and Miscellaneous Surface Coating Operations, because none of coatings currently in use at the source contain the targeted HAP in excess of the minimum concentrations defined by 40 CFR 63.11180. because this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal process, and the surface coating used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (i) The insignificant activities identified as storage tanks, with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons, are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 75 cubic meters (19,813 gallons)).
- (j) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

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

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential emissions of PM, PM-10, SO₂, VOC, NO_x, and CO, are less than 250 tons per year and of Lead is less than 25 tons per year. The source is not one of the 28 listed source categories. There are no applicable New Source Performance Standards that were in effect on August 7, 1980. The source has not conducted any modifications to trigger PSD and is currently considered a minor PSD source. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) do not apply to this source because it is located in an attainment county.

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

The unlimited potential to emit of HAPs from the *this transition* is greater than ten (10) tons per year

for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the *modified units* to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

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

- (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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions less than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on *(date)*, which is included as Attachment A to the permit.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

Panel Laminating Adhesive Application LD1

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable to each of the panel laminating adhesive application (LD1) at this source because the unit does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

There are no other 326 IAC 8 – Volatile Organic Compounds rules which apply to the panel laminating adhesive application (LD1) at this source.

Panel Laminating Adhesive Application LD2

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable to each of the panel laminating adhesive application (LD2) at this source because the unit does not have the potential to emit greater than

twenty-five (25) tons of VOCs per year.

There are no other 326 IAC 8 – Volatile Organic Compounds rules which apply to the panel laminating adhesive application (LD1 and LD2) at this source.

Panel Laminating Cleanup LD1

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

The requirements of 326 IAC 8-2-9 are not applicable to the panel laminating cleanup operation (LD1) because the usage of degreasing and cleanup solvents is not considered application of surface coatings, which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)), and since LD1 has actual VOC emissions less than fifteen (15) pounds per day before add-on controls.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3-1 are not applicable to the panel laminating cleanup operation (LD1) because the degreasing is performed using hand application of solvents.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

The requirements of the 326 IAC 20-6-1 are not applicable to the panel laminating cleanup operation (LD1) because the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

Panel Laminating Cleanup LD2

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

The requirements of 326 IAC 8-2-9 are not applicable to the panel laminating cleanup operation (LD1 and LD2) because the usage of degreasing and cleanup solvents is not considered application of surface coatings, which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)), and since they each have actual VOC emissions less than fifteen (15) pounds per day before add-on controls.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3-1 are not applicable to the panel laminating cleanup operation (LD1 and LD2) because the degreasing is performed using hand application of solvents.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

The requirements of the 326 IAC 20-6-1 are not applicable to the panel laminating cleanup operation (LD1 and LD2) because the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

Priming Booth Operation (PB1), Bus Assembly Operations AL1 and AL2, Undercoating and Foam Deadening Operation UFBLD, and Final Finish Operation FF

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

(a) PB1

The requirements of 326 IAC 6-3-2 are applicable to the Priming booth operation (PB1) because the application of the primer surface coating in priming booth PB1 using the one (1) High Volume Low Pressure (HVLP) spray gun has the potential to use greater than five (5) gallons per day of surface coatings. Therefore, pursuant to 326 IAC 6-3-2(d), particulate from priming booth PB1 shall be controlled by a dry particulate filters, waterwash, or an equivalent control device and the control device must be operated in accordance with manufacturer's specifications.

(b) AL1, AL2, UFBLD and FF

The requirements of 326 IAC 6-3-2 are not applicable to the Bus Assembly Operation (AL1 and AL2), Undercoating and Foam Deadening Operation (UFBLD), and Final Finish

Operation (FF), because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour each.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

- (a) PB1
 The requirements of 326 IAC 8-1-6 are not applicable to the metal surface coating in the Priming Booth (PB1) because this operation has the potential to emit VOC less than 25 tons per year and is specifically regulated by 326 IAC 8-2-9.
- (b) AL1 and AL2
 The requirements of 326 IAC 8-1-6 will not apply to the Bus Assembly Operation (AL1 and AL2) because the source has requested that the surface coating of wood with contact adhesive and the cleanup solvent usage for the Bus Assembly Operation (AL1 and AL2) be limited to less than twenty-five (25) tons per twelve consecutive month period. This limit will render the requirements of 326 IAC 8-1-6 not applicable. This limit does not apply to the VOC emissions from the surface coating of metal performed in the Bus Assembly Operation (AL1 and AL2) because it is specifically regulated by 326 IAC 8-2-9.

NOTE: The existing VOC emission limitation is based on FESOP Permit No. 039-29115-00442.

- (c) UFBLD and FF
 The requirements of 326 IAC 8-1-6 are not applicable to the undercoating and foam deadening operation (UFBLD) and Final Finish Operation (FF) since this operation is specifically regulated by 326 IAC 8-2-9.
- (d) FF
 The requirements of 326 IAC 8-1-6 are not applicable to the Final Finish Operation (FF) at this source because it does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to the metal surface coating operation and the facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. These facilities are under major group #37 of the Standard Industrial Classification Code (SIC). See table below.

Unit ID	Date of Construction	Metal coating VOC emissions lbs/day	Metal coating 326 IAC 8-2-9 applicability July 1, 1990
Priming Booth- PB1	2005	>15 lbs/day	yes
Bus Assembly Operation AL1 and AL2 (metal coating only)	2005	>15 lbs/day	yes
Under Coating and Foam Application - UFBLD	2005	>15 lbs/day	yes

Pursuant to 326 IAC 8-2-9(c), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

- (a) Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are applicable to surface coating operations at the Priming Booth Operation PB1, Bus Assembly operations AL1 and AL2, and Undercoating and Foam Deadening Operation (UFBLD) operation and shall be limited to the following:
 - (1) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to

a coating applicator, in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

- (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
- (A) temperatures consistently above ninety-five (95) degrees Celsius;
 - (B) detergents;
 - (C) abrasive or scouring agents;
 - (D) solvents;
 - (E) corrosive atmospheres;
 - (F) outdoor weather at all times; or
 - (G) similar environmental conditions.

Compliance with the VOC content limit in the Bus Assembly operations AL1 and AL2, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

Where:

- A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
- C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
- U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
- n is the number of coatings being averaged

AL1 and AL2 (Metal coating only)	Product	Material coating	content lbs voc/gallon of coating less water as applied	Material Usage (gals/unit)	Throughput (unit/day)	Total Material Usage (gals/day)	Potential VOC emissions (lbs voc/day)	Volume Weighted Average
	Pro Series Caulk	1	3.250	0.400	27.600	11.040	35.880	0.526
	Dow Silicone Sealer	2	0.610	0.412	27.600	11.371	6.936	0.102
	Dupont 99	3	4.750	0.125	27.600	3.450	16.388	0.240
	Sika Flex Sealant	4	0.600	0.346	27.600	9.550	5.730	0.084
	Cyclo C-33 Silicone	5	3.350	0.690	27.600	19.044	2.310	0.034
	SF Subfloor Adhesive	6	0.030	0.500	27.600	13.800	0.240	0.004
TOTALS						68.255	67.484	0.989

Where: Volume Weighted Average = PTE VOC (lbs/voc per day) / total material usage

NOTE1: Based on information provided by the source, the VOC content of the coating used in the Priming Booth (PB1) is 2.98 pounds per gallon less water which is less than 3.5 pounds

per gallon less water required by 326 IAC 8-2-9(c). This coating is in compliance with 326 IAC 8-2-9(c).

NOTE2a: The table above summarizes metal surface coating operations in the Bus Assembly operations AL1 and AL2. Based on the maximum usage information provided by the source, the volume weighted VOC content of the coatings is less than 3.5 pounds of VOC per gallon.

NOTE2b: The requirements of 326 IAC 8-2-9 are not applicable to the surface coating of wood with contact adhesive in the Bus Assembly Operation (AL1 and AL2) because it does not include the surface coating of metal.

NOTE3: Based on information provided by the source, the VOC content of the coating used in the Undercoating and Foam Deading Operation (UFBLD) is 1.46 pounds per gallon less water which is less than the 3.5 pounds per gallon less water required by 326 IAC 8-2-9(d). This coating is in compliance with 326 IAC 8-2-9(c).

(b) Clean-up Requirements [(326 IAC 8-2-9)(f)]

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3-1 are not applicable to the cleanup operations for the Priming Booth (PB1), Bus Assembly Operation (AL1, AL2), Undercoating and Foam Deadening Operation (UFBLD), and Final Finish Operation (FF), because the degreasing is performed using hand or soak application of solvents.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

The requirements of 326 IAC 20-6-1 are not applicable to the cleanup operations for the Priming Booth (PB1), Bus Assembly Operation (AL1, AL2) and Undercoating and Foam Deadening Operation (UFBLD), and Final Finish Operation (FF) because the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

326 IAC 8-2-11 (Volatile Organic Compounds, Fabric and Vinyl Coating)

The requirements of 326 IAC 8-2-11 are not applicable to this source, since this source does not perform surface coating of fabric or vinyl as defined by 326 IAC 8-2-11(a).

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The requirements of 326 IAC 8-2-2 are not applicable to this source because this source does not perform surface coating of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a). This source assembles motorized buses.

Touchup Booth (TB1)

326 IAC 8-1-6 Best available Control technology (BACT)

The requirements of 326 IAC 8-1-6 are not applicable to the Touchup Booth (TB1), when coating plastic, because the potential VOC emissions are less than 25 tons per year.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

The requirements of 326 IAC 8-2-9 are not applicable to the Paint Touchup Booth Operation (TB1) because the surface coating done in the Paint Touchup Booth (TB1) is the application of coatings to plastic and does not include surface coating of metal.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3-1 are not applicable to the cleanup operation in the Paint Touchup Booth (TB1) because the degreasing is done using hand or soak application of solvents.

There are no 326 IAC 8 rules that apply.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

The requirements of 326 IAC 20-6-1 are not applicable to the Touchup Booth Operation (TB1) because the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

Ambulance Assembly shop MMA

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

The Ambulance Assembly Shop, identified as MMA, is exempt from the requirements of 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies) because there is no potential to emit of particulate from glue and adhesive applications since the application methods that the source employs consist of aerosol, flow and trowel.

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

The Ambulance Assembly Shop (MMA) is approved for construction in 2011, and has potential VOC emissions of less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 does not apply.

Note: MMA was previously permitted at Plant 2. However, in this transition permit, MMA is being moved in Plant 1 and thus considered a new emission unit.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

The ambulance assembly operation (MMA) is not subject to 326 IAC 8-2-9 because this facility engaged in customized top coating of motor vehicles coating less than 35 vehicles per day pursuant to 326 IAC 8-2-9(b)(4). Therefore, 326 IAC 8-2-9 does not apply.

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

The adhesive application operations identified as ambulance assembly operations (MMA) is not subject to 326 IAC 8-2-12 because the wood products being coated are floors and/or wood lockers integral to the vehicle being produced, not wood furniture.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This source is not subject to this rule because the ambulances which are coated at this source do not

qualify as automobiles and light duty trucks because the gross vehicle weight of an ambulance is equal to or less than 8,500 pounds.

326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 are not applicable to this facility because it does not apply surface coating to wood furniture or cabinets. This source performs surface coating of structural wood frames, sidewalls, and floors with adhesives, caulks, and primer.

326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)

The requirements of 326 IAC 8-11-3 are not applicable to this facility because this source does not manufacture wood furniture.

Ambulance Undercoating MMU

326 IAC 8-1-6 Best available Control technology (BACT)

The ambulance undercoating (MMU) has potential to emit of VOC less than twenty-five (25) tons of per year, therefore, the requirements of 326 IAC 8-1-6 are not applicable to this operation. In addition, MMU is subject to 326 IAC 8-2-9 (see below).

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

(a) Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are applicable to Ambulance Undercoating MMU, and shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:

- (A) temperatures consistently above ninety-five (95) degrees Celsius;
- (B) detergents;
- (C) abrasive or scouring agents;
- (D) solvents;
- (E) corrosive atmospheres;
- (F) outdoor weather at all times; or
- (G) similar environmental conditions.

Compliance with the VOC content limit in the Ambulance Undercoating MMU, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

Where:

- A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
- C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
- U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
- n is the number of coatings being averaged

(b) Clean-up Requirements [(326 IAC 8-2-9)(f)]

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This source is not subject to this rule because the ambulances which are coated at this source do not qualify as automobiles and light duty trucks because the gross vehicle weight of an ambulance is equal to or less than 8,500 pounds.

326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 are not applicable to this facility because it does not apply surface coating to wood furniture or cabinets. This source performs surface coating of structural wood frames, sidewalls, and floors with adhesives, caulks, and primer.

326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)

The requirements of 326 IAC 8-11-3 are not applicable to this facility because this source does not manufacture wood furniture.

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

Spray undercoating operation (MMU) which is performed throughout the plant with aerosol spray cans does not have a stack exhaust and therefore is not required to install dry filters. However, as an equivalent means of controlling particulate emissions, MMU shall comply with 326 IAC 6-3-2(d) by complying with the following work practice standards:

- (1) Operate the coating operation inside the building.
- (2) If accumulations of undercoating are observed on fans, tanks or on the ground outside the plant; then overspray controls must be installed.
- (3) Maintain and operate the coating equipment according to manufacturer's Recommendations.

Woodworking Operation WW1, WW2

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the handheld woodworking operation, WW1 shall not exceed 0.94 pounds per hour based on a process weight rate equal to 0.3155 tons of wood per hour (313 pounds of wood per hour).

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the handheld woodworking operation, WW2 shall not exceed 0.94 pounds per hour based on a process weight rate equal to 0.3155 tons of wood per hour (313 pounds of wood per hour).

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

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

OAQ has determined the control devices are integral to each of the wood working operation. Potential emissions were calculated after controls. The respective control device system must be in operation at all times when the wood working is in operation in order to comply with this limit. The Permittee shall operate the control device in accordance with manufacturer's specifications.

Ambulances: brazing equipment, cutting torches, soldering equipment, welding

- (a) Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is exempt from the requirements of 326 IAC 6-3-2, because each welding operation consumes less than 625 pounds of rod or wire per day.
- (b) Pursuant to 326 IAC 6-3-1(b)(10), the plasma cutting operation is exempt from the requirements of 326 IAC 6-3-2, because less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

Metal Cutting Equipment

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

- (a) The requirements of 326 IAC 6-3-1(b)(14) are not applicable to the eighteen (18) chop saws (CS1 through CS18), the four (4) drill presses (DP1 through DP4), and the eight (8) band saws (BS1 through BS8) because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the two (2) miter saws (MS1 and MS2), shall not exceed 0.81 pounds per hour based on a process weight rate equal to 0.25 tons of metal per hour each.

The potential emissions are less than 0.71 lbs/hr each, therefore the control device is not required to operate.

Foam Cutting Equipment

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

Pursuant to 326 IAC 6-3-1(b)(14), the foam cutting equipment at this source (i.e., the four (4) table saws (TS1 through TS4)) are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Ambulance Carpenter shop MMC

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

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the ambulance carpenter shop (MMC) shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour:

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

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

The integral control device, cyclone shall be in operation at all times the carpenter shop is in operation, in order to comply with this limit.

Plant 2: Goshen Coach & Marque McCoy Miller, located at 1110 DI Drive, Elkhart, IN.

Ambulance Body Shop/prime and Paint Booth (MMP)

326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies)
Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operation (MMP) shall be controlled by a dry particulate filter, waterwash, or the Permittee shall operate the equivalent control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The Volatile Organic Compound (VOC) input to the ambulance body shop/prime and paint booth (MMP) shall be limited to 24.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

NOTE: These limits are based on the permit No.: F039-25492-00508, issued on March 12, 2008.

Natural Gas space heaters, Furnaces

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired source-wide space heaters and furnaces, are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired source-wide space heaters and furnaces not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they each have the potential to emit particulate matter less than 0.551 pounds per hour each.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
The natural gas-fired source-wide space heaters and furnaces are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour each.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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(a) The compliance determination and monitoring requirements applicable to this source are as follows:

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

Emission Units	Frequency	Parameters
Ambulance body shop/prime and paint booths MMP, Priming booth operation PB1	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
Ambulance body shop/prime and paint booths MMP, Priming booth operation PB1	Weekly	Observations of the overspray from the paint booth stacks, while one or more booths are in operation.
Ambulance body shop/prime and paint booths MMP, Priming booth operation PB1	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

- (b) The compliance monitoring for bus assembly operation AL1 and AL2, Undercoating is not required because potential particulate emissions are less than exempt level.
- (c) The integral baghouses and the integral cyclones shall be inspected each calender quarter and will be replaced if defective.
- (d) The testing requirements applicable to this source are as follows:
 PM, PM10 and PM2.5 testing is not required for any facilities located at this source because the particulate emissions from any one facility do not account for a significant portion of the sources potential to emit particulates. The compliance with 326 IAC 6-3-2 is expected with the use of the dry filters for surface coating operations and the compliance monitoring of the control devices will ensure compliance with the limitations.
- (e) VOC testing is not required for any facilities located at this source because no facilities utilize a control device and VOC emissions are assumed to be 100% of VOC input. Therefore, compliance is determined through records of VOC usage.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 25, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F039-30375-00442. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5376) or toll free at 1-800-451-6027 extension (4-5376).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Unlimited Emission Summary Plant 1 and Plant 2**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive. and
1110 DI Drive, Elkhart, IN 46514
Reviewer: Swarna Prabha**

Uncontrolled Potential Emissions

Emission Unit	PM (tons/yr)	PM₁₀ (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Goshen Coach & Marque McCoy Miller Plant 1	25.34	25.48	25.48	0.01	137.75	1.98	2,849.70	2.36	17.75
Goshen Coach & Marque McCoy Miller Plant 2	24.23	24.36	24.36	0.01	57.15	1.88	2,707.45	2.24	13.85
Total Emissions	49.57	49.83	49.83	0.03	194.90	3.87	5,557.15	4.60	31.60

Limited Potential Emissions

Emission Unit	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Goshen Coach & Marque McCoy Miller Plant 1	25.34	25.48	25.48	0.014	VOC <100	1.98	2,849.70	2.36	Single HAP <10 Combined HAPs < 25
Goshen Coach & Marque McCoy Miller Plant 2	24.23	24.36	24.36	0.013		1.88	2,707.45	2.24	
Total Emissions	49.57	49.83	49.83	0.028		3.87	5,557.15	4.60	

See Technical Support Document table " Potential to emit of the entire source after issuance of FESOP (tons/yr)'

**Appendix A: Emissions Calculations
Emission Summary Plant 1**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Uncontrolled Potential Emissions Plant 1

	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	(tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit									
Panel Laminating Adhesive Application (LD1 and LD2)	0.00	0.00	0.00	0.00	1.84E-07	0.00	0.00	0.00	negl.
Panel Laminating Cleanup (LD1 and LD2)	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00
Primer Booth (PB1)	8.85	8.85	8.85	0.00	17.34	0.00	0.00	0.00	4.39
Bus Assembly Operations (AL1 and AL2)	1.17	1.17	1.17	0.00	63.96	0.00	0.00	0.00	8.32
Undercoating and Cleanup (UFBLD)	0.00	0.00	0.00	0.00	10.42	0.00	0.00	0.00	1.43
Foam Deadening (UFBLD)	0.00	0.00	0.00	0.00	2.71E-08	0.00	0.00	0.00	negl.
Final Finish (FF)	0.16	0.16	0.16	0.00	1.61	0.00	0.00	0.00	1.34
Touchup Booth (TB1)	0.82	0.82	0.82	0.00	2.19	0.00	0.00	0.00	0.60
Ambulance Assembly (MMA)	0.81	0.81	0.81	0.00	17.94	0.00	0.00	0.00	0.00
Ambulance Undercoating (MMU)	5.39	5.39	5.39	0.00	23.79	0.00	0.00	0.00	0.00
*Ambulance Carpenter Shop (MMC)	0.16	0.16	0.16	0.00	0.00	0.00	0.00	0.00	0.00
*Woodworking (WW1 and WW2)	0.23	0.23	0.23	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.04	0.18	0.18	0.014	0.13	1.98	2,849.70	2.36	2.05E-03
Buses Welding and Cutting (WMFD)	1.24	1.24	1.24	0.00	0.00	0.00	0.00	0.00	0.70
Buses Welding Degreasing	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00
Ambulaces Welding and curtiing	1.89	1.89	1.89	0.00	0.00	0.00	0.00	0.00	0.95
Miscellaneous metal fabrication	4.56	4.56	4.56	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	25.34	25.48	25.47	0.014	137.75	1.98	2,849.70	2.36	17.75

*IDEM calculated particulate emissions from woodworking operations after control, which is considered integral to the system .

**Appendix A: Emissions Calculations
Emission Summary Plant 1**

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

controlled/Limited Potential Emissions

Emission Unit	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	(tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Panel Laminating Adhesive Application (LD1 and LD2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	negl.
Panel Laminating Cleanup (LD1 and LD2)	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00
Primer Booth (PB1)	0.44	0.44	0.44	0.00	17.34	0.00	0.00	0.00	4.39
Bus Assembly Operations (AL1 and AL2)**	1.17	1.17	1.17	0.00	<25	0.00	0.00	0.00	8.32
Undercoating and Cleanup (UFBLD)	0.00	0.00	0.00	0.00	10.42	0.00	0.00	0.00	1.43
Foam Deadening (UFBLD)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	negl.
Final Finish (FF)	0.16	0.16	0.16	0.00	1.61	0.00	0.00	0.00	1.34
Touchup Booth (TB1)	0.04	0.04	0.04	0.00	2.19	0.00	0.00	0.00	0.60
Ambulance Assembly (MMA)	0.81	0.81	0.81	0.00	17.94	0.00	0.00	0.00	0.00
Ambulance Undercoating (MMU)	5.39	5.39	5.39	0.00	0.00	0.00	0.00	0.00	0.00
*Ambulance Carpenter Shop (MMC)	0.16	0.16	0.16	0.00	0.00	0.00	0.00	0.00	0.00
*Woodworking (WW1 and WW2)	0.23	0.23	0.23	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.04	0.18	0.18	0.01	0.13	1.98	2849.70	2.36	0.00
Buses Welding and Cutting (WMFD)	1.24	1.24	1.24	0.00	0.00	0.00	0.00	0.00	0.70
Buses Welding Degreasing	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.95
Ambulances Welding and curtling	1.89	1.89	1.89	0.00	0.00	0.00	0.00	0.00	0.00
Miscellaneous metal fabrication	4.56	4.56	4.56	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	16.15	16.29	16.29	0.01	50.00	1.98	2849.70	2.36	17.75

**Includes VOC PTE Restriction for Wood Coating Adhesive Application

There are no emissions for PM2.5, Therefore PM10 = PM 2.5

Potential emissions for woodworking operations are calculated after the consideration of the controls.

**Appendix A: Emissions Calculations
Emission Summary Plant 2**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Uncontrolled Potential Emissions

	*PM (tons/yr)	*PM₁₀ (tons/yr)	*PM_{2.5} (tons/yr)	SO₂ (tons/yr)	*VOC (tons/yr)	CO (tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit									
Ambulance Body Shop/Prime and paint booth (MMP)	24.19	24.19	24.19	0.00	57.03	0.00	0.00	0.00	13.81
Natural Gas Combustion Units	0.04	0.17	0.17	0.01	0.12	1.88	2,707.45	2.24	0.04
Total Emissions	24.23	24.36	24.36	0.01	57.15	1.88	2,707.45	2.24	13.85

*PM and VOC emissions from MMP facility include surface coating operation and body shop operation combined.

Controlled/ Limited potential emissions

	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit									
Ambulance Body Shop/Prime and paint booth (MMP)	0.57	0.57	0.57	0.00	<24.80**	0.00	0.00	0.00	**
Natural Gas Combustion Units	0.04	0.17	0.17	0.01	**	1.88	2,707.45	2.24	**
Total Emissions	0.61	0.74	0.74	0.01	**	1.88	2,707.45	2.24	**

**Combined limited VOC emissions from Plant 1 and Plant 2 are less than 100 tons/yr to comply with FESOP 326 IAC 2-8-4

Appendix A: VOC & Isocyanate Emissions
Two (2) Panel Laminating Machines (LD1 & LD2)

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive. And
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

	<u>Variables</u>	<u>Units</u>
W = Evaporative Losses (grams/day)		
	<u>Stabond</u> 1.023E-05 mm HG	<u>1.346E-08</u> <u>Atm</u>
MW = Molecular Weight (MDI = 250.26)		<u>250.26</u>
Tproc = Process Temperature (Kelvin)	<u>Stabond</u> 77 F	<u>298.15</u> <u>K</u>
u = Air Flow Rate (m/s)	100 ft/min	<u>0.508</u> <u>m/s</u>

SA = Exposed Surface Area (Square Meters Exposed/Day)

Adhesive	Use	Line 1 Units Annual (Average Size)	Line 2 Units Annual (Large Size)	Maximum Area Coated Annual (ft2)	Maximum Area Coated per Day (ft2)	<u>Maximum Exposed Area M2/Day</u>	<u>Units</u>	<u>Emissions grams/day per Formula</u>
STABOND	Sidewalls/Doors	8760	1314	5,584,500	15,300.00	<u>1,421.42</u>	<u>M2</u>	<u>4.57E-04</u>
	Line 1 Coverage	525	sf/unit					
	Line 2 Coverage	750	sf/unit					

tTF = Tack Free Time in Seconds (Default = 5 Seconds)

5 s

Kmdi = Vapor Pressure Adjustment Factor for Polyisocyanate Concentration (80 degrees @ 30% MDI from Table B)

0.38

Potential Emission Rate	4.57E-04 grams/day	
Potential Emission Rate	1.90E-05 grams/hour	= grams/day / 24 hours/day
Potential Emission Rate	4.20E-08 lbs/hour	= grams/hour / 453.5 grams/lb
Potential Emission Rate	1.01E-06 lbs/day	= lbs/hour x 24 hours /day
Potential Emission Rate	1.84E-07 tons/year	= lbs/day x 365 days/year x 1/2,000 lb/ton

METHODOLOGY

Alliance for the Polyurethanes Industry: Estimating MDI Emissions for Section 313 of EPCRA Reporting

Formula $W = 25.4 * VP_{mdi} * (MW / T_{proc}) * u^{*0.78} * SA * tTF * K_{mdi}$

Where:

W = Evaporation losses in grams/day.

VP_{mdi} = Vapor Pressure at Temperature Used (Atmospheres) at process temperature

T_{proc} = Process Temperature (Kelvin)

Mw = the molecular weight of MDI (250.26)

T_{proc} = the process temperature in °K.

u = Air Flow Rate (m/s)

SA = Exposed Surface Area (Square Meters Exposed/Day)

K_{mdi} = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the storage temperature.

tTF = Tack Free Time in Seconds (Default = 5 Seconds)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Panel Laminating Cleanup Solvent (LD1 & LD2)**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Non-VOC (Acetone)	Weight % Organics	Volume % Water & Non-VOC (Acetone)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water & Non-VOC	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
N-Methyl Pyrrolidone	8.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.00596	1.150	8.59	8.59	0.06	1.41	0.26	0.00	#DIV/0!	100%

Potential to Emit **0.06 1.41 0.26 0.00**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

METHODOLOGY

This material does not contain Hazardous Air Pollutants

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating (Primer) Operations (PB1)
Unit Floor Frames

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
90-208 Gray Primer*	10.01	29.77%	0.00%	29.77%	0.00%	60.30%	1.000	1.15	2.98	2.98	3.43	82.25	15.01	8.85	4.94	75%
Pure Lacquer Thinner**	7.02	100.00%	0.00%	100.00%	0.00%	0.00%	0.066	1.15	7.02	7.02	0.53	12.79	2.33	0.00	#DIV/0!	100%

Potential to Emit 3.96 95.04 17.34 8.85
2.02 lb/hr

*Coating = High Volume, Low Pressure Application

*Solvent = Hand or Soak Application

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Weight % Methanol	Weight % MIBK	Weight % Toluene	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
90-208 Gray Primer*	10.01	1.00000	1.150	5.00%	0.00%	0.00%	0.00%	2.52	0.00	0.00	0.00	2.52
Pure Lacquer Thinner**	7.02	0.06600	1.150	0.00%	10.00%	10.00%	60.00%	0.00	0.23	0.23	1.40	1.87
State Potential Emissions								2.52	0.23	0.23	1.40	4.39

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Two (2) Bus Assembly Lines (AL1 & AL2)

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Notes Below)	Substrate
Pro Series Caulk*	11.20	29.00%	0.00%	29.00%	0.00%	50.00%	0.40000	1.150	3.25	3.25	1.49	35.86	6.54	0.00	6.50	100%	Plastic, Metal
Sta-Put 2100M Adhesive**	5.87	75.70%	0.00%	75.70%	0.00%	20.22%	2.11000	1.150	4.44	4.44	10.78	258.78	47.23	0.00	21.98	100%	Wood, Rubber
Dow Silicone Sealer*	12.26	5.00%	0.00%	5.00%	0.00%	90.70%	0.41200	1.150	0.61	0.61	0.29	6.97	1.27	0.00	0.68	100%	Metal, Rubber
Dupont 99A Aerosol Paint***	8.03	59.12%	0.00%	59.12%	0.00%	34.38%	0.12500	1.150	4.75	4.75	0.68	16.38	2.99	1.03	13.81	50%	Metal, Wood
Sika Flex Sealant*	10.00	6.00%	0.00%	6.00%	0.00%	91.73%	0.34600	1.150	0.60	0.60	0.24	5.73	1.05	0.00	0.65	100%	Metal
Pure Lacquer Thinner*	7.02	100.00%	0.00%	100.00%	0.00%	0.00%	0.12500	1.150	7.02	7.02	1.01	24.22	4.42	0.00	#DIV/0!	100%	Not Applicable
Cyclo C-33 Silicone***	5.59	60.00%	0.00%	60.00%	0.00%	40.86%	0.02500	1.150	3.35	3.35	0.10	2.31	0.42	0.14	8.21	50%	Metal, Wood
SF-550 Subfloor Adhesive*	11.48	30.00%	29.85%	0.15%	41.09%	55.00%	0.50000	1.150	0.03	0.02	0.01	0.24	0.04	0.00	0.03	100%	Wood, Rubber, Metal

Potential to Emit 14.60 350.48 63.96 1.17

*Hand or Manual Application Metal only 67.488 12.32
**Non-Atomized Pressurized Flow Application Other substrate 51.65
***Aerosol Application

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Ethylene Glycol	Weight % Methanol	Weight % MIBK	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Pro Series Caulk*	11.20	0.40000	1.150	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sta-Put 2100M Adhesive**	5.87	2.11000	1.150	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dow Silicone Sealer*	12.26	0.41200	1.150	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.27	0.00	0.00	0.00	0.00	1.27
Dupont 99A Aerosol Paint***	8.03	0.12500	1.150	3.20%	2.00%	0.00%	0.20%	19.00%	13.00%	0.16	0.10	0.00	0.00	0.01	0.96	0.66	1.89	
Sika Flex Sealant*	10.00	0.34600	1.150	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.00%	0.00	0.00	0.00	0.00	0.00	0.00	1.05	1.05
Pure Lacquer Thinner*	7.02	0.12500	1.150	0.00%	0.00%	10.00%	10.00%	0.00%	60.00%	0.00%	0.00	0.00	0.44	0.44	0.00	2.65	0.00	3.54
Cyclo C-33 Silicone***	5.59	0.02500	1.150	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-550 Subfloor Adhesive*	11.48	0.50000	1.150	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.58	0.00	0.00	0.00	0.00	0.00	0.58

Uncontrolled Potential Emissions	0.16	0.68	1.71	0.44	0.01	3.61	1.70	8.32
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METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Undercoating & Foam Deadening Building (UFBLD)

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Undercoating ZPG*	10.84	20.50%	9.00%	11.50%	14.76%	62.00%	1.43000	1.150	1.46	1.25	2.05	49.21	8.98	0.00	2.01	100%
DOW DPM Solvent**	8.18	100.00%	3.30%	96.70%	3.24%	0.00%	0.03600	1.150	8.17	7.91	0.33	7.86	1.43	0.00	#DIV/0!	100%

Potential to Emit **2.38 57.07 10.42 -**

*High Volume, Low Pressure Flow Application of Coating/Manual Application of Cleanup Solvent

**Cleanup Only for Both Undercoating and Foam Deadening

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ether Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Undercoating ZPG*	10.84	1.43000	1.150	0.00%	0.00	0.00
DOW DPM Solvent**	8.18	0.03600	1.150	96.70%	1.43	1.43
Uncontrolled Potential Emissions					1.43	1.43

METHODOLOGY

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

Company Name: Goshen Coach & Marque McCoy Miller
 Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
 Permit Number: M039-30375-00442
 Reviewer: Swarna Prabha

	<u>Jamecel</u>	1.023E-05	mm HG	<u>Variables</u> <u>1.346E-08</u>	<u>Units</u> <u>Atm</u>
				MW = Molecular Weight (MDI) =	<u>250.26</u>
Tproc = Process Temperature (Kelvin)	<u>Jamecel</u>	77	F	<u>298.15</u>	<u>K</u>
u = Air Flow Rate (m/s)		100	ft/min	<u>0.508</u>	<u>m/s</u>

SA = Exposed Surface Area (Square Meters Exposed/Day)

Adhesive	Use	Line 1 Units Annual (Average Size)	Line 2 Units Annual (Large Size)	Maximum Area Coated Annual (ft2)	Maximum Area Coated per Day (ft2)	<u>Maximum</u> <u>Exposed</u> <u>Area</u> <u>M2/Day</u>	<u>Units</u>	<u>Emissions</u> <u>grams/day</u> <u>per Formula</u>
JAMECEL (Parts A&B)	Foam Deadening	8760	1314	569,181	1,559.40	<u>144.87</u>	<u>M2</u>	<u>6.74E-05</u>
	Line 1 Coverage	56.5	sf/unit					
	Line 2 Coverage	56.5	sf/unit					

tTF = Tack Free Time in Seconds (Default = 5 Seconds) 5 s

Kmdi = Vapor Pressure Adjustment Factor for Polyisocyanate Concentration (80 degrees @ 50% MDI from Table B) 0.55

Potential Emission Rate 6.74E-05 grams/day
 Potential Emission Rate 2.81E-06 grams/hour = grams/day / 24 hours/day
 Potential Emission Rate 6.19E-09 lbs/hour = grams/hour / 453.5 grams/lb
 Potential Emission Rate 1.49E-07 lbs/day = lbs/hour x 24 hours / day
 Potential Emission Rate 2.71E-08 tons/year = lbs/day x 365 days/year x 1/2,000 lb/ton

METHODOLOGY

Alliance for the Polyurethanes Industry: Estimating MDI Emissions for Section 313 of EPCRA Reporting

Formula $W = 25.4 * VP_{mdi} * (MW / T_{proc}) * u^{0.78} * SA * tTF * K_{mdi}$

Where:

- W = Evaporation losses in grams/day.
- VP_{mdi} = Vapor Pressure at Temperature Used (Atmospheres) at process temperature
- T_{proc} = Process Temperature (Kelvin)
- M_w = the molecular weight of MDI (250.26)
- T_{proc} = the process temperature in °K.
- u = Air Flow Rate (m/s)
- SA = Exposed Surface Area (Square Meters Exposed/Day)
- K_{mdi} = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the storage temperature.
- tTF = Tack Free Time in Seconds (Default = 5 Seconds)

Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations

Final Finish Operations (FF)

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Notes Below)
Crazy Clean 31**	8.17	99.80%	79.45%	20.35%	77.83%	2.23%	0.03125	1.150	7.50	1.66	0.06	1.43	0.26	0.00	74.56	50%
Spartan Shine**	8.27	75.00%	60.00%	15.00%	59.50%	24.82%	0.03125	1.150	3.06	1.24	0.04	1.07	0.20	0.16	5.00	50%
DX-440*	6.94	100.00%	0.00%	100.00%	0.00%	0.00%	0.03125	1.150	6.94	6.94	0.25	5.99	1.09	0.00	#DIV/0!	100%
Glass Cleaner*	8.26	99.00%	94.00%	5.00%	93.10%	50.00%	0.03125	1.150	5.98	0.41	0.01	0.36	0.07	0.00	0.83	100%

Potential to Emit

0.37 8.85 1.61 0.16

*Hand or Manual Application

**Aerosol Application

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Napthalene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Napthalene Emisions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Crazy Clean 31**	8.17	0.03125	1.150	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Spartan Shine**	8.27	0.03125	1.150	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
DX-440*	6.94	0.03125	1.150	13.00%	40.00%	70.00%	0.14	0.44	0.76	1.34
Glass Cleaner*	8.26	0.03125	1.150	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Uncontrolled Potential Emissions							0.14	0.44	0.76	1.34

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations (TB1)
Touchup Paint Booth

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
PPG 3.5 VOC Basecoat Binder	8.43	22.92%	0.00%	22.92%	0.00%	73.00%	0.03125	1.150	1.93	1.93	0.07	1.67	0.30	0.51	2.65	50%
Clearcoat*	8.28	52.98%	0.00%	52.98%	0.00%	39.95%	0.03125	1.150	4.39	4.39	0.16	3.78	0.69	0.31	10.98	50%
Dupont 222S Clear Adhesion Promoting Sealer**	7.08	94.22%	18.36%	75.86%	19.67%	4.11%	0.03125	1.150	6.69	5.37	0.19	4.63	0.85	0.00	130.68	100%
Pure Lacquer Thinner**	7.02	100.00%	0.00%	100.00%	0.00%	0.00%	0.01000	1.150	7.02	7.02	0.08	1.94	0.35	0.00	#DIV/0!	100%

Potential to Emit **0.50 12.02 2.19 0.82**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
PPG 3.5 VOC Basecoat Binder	8.43	0.03125	1.150	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat*	8.28	0.03125	1.150	0.00%	0.00%	0.00%	13.00%	0.00%	0.00	0.00	0.00	0.17	0.00	0.17
Dupont 222S Clear Adhesion Promoting Sealer**	7.08	0.03125	1.150	0.00%	0.00%	0.00%	13.00%	0.00%	0.00	0.00	0.00	0.14	0.00	0.14
Pure Lacquer Thinner**	7.02	0.01000	1.150	0.00%	10.00%	10.00%	60.00%	0.00%	0.00	0.04	0.04	0.21	0.00	0.28
State Potential Emissions									0.00	0.04	0.04	0.53	0.00	0.60

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations-MMA**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Unit ID: Abulance Assembly (MMA)

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*	Substrate
3M 94 Primer	6.84	97.00%	0.00%	97.00%	0.00%	9.85%	0.0037	0.625	6.63	6.63	0.02	0.37	0.07	0.00	67.36	100%	Cleaner
3M Weatherstrip Adhesive	7.51	62.13%	0.69%	61.44%	0.70%	36.60%	0.0276	0.625	4.65	4.61	0.08	1.91	0.35	0.00	12.61	100%	Rubber/Wood
DM100 Spatter Paint	6.89	49.60%	0.00%	49.60%	0.00%	13.00%	0.0010	0.625	3.42	3.42	0.002	0.05	0.01	0.005	26.29	50%	Metal
Bondaflex 100GP Sealant	8.59	3.50%	0.00%	3.50%	0.00%	95.92%	1.1917	0.625	0.30	0.30	0.22	5.37	0.98	0.00	0.31	100%	Metal
Sikaflex Sealant 221	10.60	4.40%	0.00%	4.40%	0.00%	93.66%	1.0129	0.625	0.47	0.47	0.30	7.09	1.29	0.00	0.50	100%	Metal
Sika Cleaner 226	6.70	99.40%	0.00%	99.40%	0.00%	9.51%	0.0028	0.625	6.66	6.66	0.01	0.28	0.05	0.00	70.03	100%	Cleaner
Touch N Seal Foam	10.01	0.00%	0.00%	0.00%	0.00%	100.00%	0.0347	0.625	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Metal
AAT-272 Sheet Vinyl Adhesive	10.00	32.00%	32.00%	0.00%	38.37%	61.63%	0.1544	0.625	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood
ECK Corrosion Inhibitor	11.01	48.10%	0.00%	48.10%	0.00%	28.05%	0.1352	0.625	5.30	5.30	0.45	10.74	1.96	0.00	18.88	100%	Metal
Russell 676 Spray Adhesive	5.84	69.20%	15.00%	54.20%	13.25%	38.86%	0.3233	0.625	3.65	3.17	0.64	15.35	2.80	0.80	8.15	50%	Plastic/Wood
Temp-Coat 101	5.19	45.26%	45.07%	0.19%	28.05%	68.08%	0.1287	0.625	0.01	0.01	0.00	0.02	0.00	0.00	0.01	100%	Metal
Seamfil 901	8.34	70.00%	20.00%	50.00%	25.23%	20.68%	0.0062	0.625	5.58	4.17	0.02	0.39	0.07	0.00	20.16	100%	Plastic/Wood
DegaBond 400	9.59	32.46%	0.00%	32.46%	0.00%	57.70%	0.4495	0.625	3.11	3.11	0.87	20.99	3.83	0.00	5.39	100%	Rubber/Metal
Cyclo C-31 Glass Cleaner	8.34	96.00%	90.00%	6.00%	90.00%	4.00%	0.0207	0.625	5.00	0.50	0.01	0.16	0.03	0.01	12.51	50%	Glass
Chem Tech Spray Adhesive	6.67	81.50%	30.00%	51.50%	30.27%	26.14%	0.6912	0.625	4.93	3.44	1.48	35.61	6.50	0.00	13.14	100%	Rubber/Wood

*Transfer Efficiency = Hand Application (Wiping/Brush/Rolling/Flow Coat) 100%; Aerosol Application 50%

State Potential Emissions

4.10 98.33 17.94 0.810

METHODOLOGY

**Metal Only 23.27 8.08
Other substrate only 9.87**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**Appendix A: Emissions Calculations
HAP Emission Calculations MMA**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Unit ID: Abmulance Assembly (MMA)

Process/Coating ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MDI	Weight % Hexane	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MDI** Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total (ton/yr)
3M 94 Primer	6.84	0.0037	0.625	10.00%	0.50%	35.00%	0.00%	0.00%	1.00%	0.01	0.00	0.02	0.00	0.00	0.001	0.03
3M Weatherstrip Adhesive	7.51	0.0276	0.625	1.00%	10.00%	5.00%	0.00%	0.00%	0.00%	0.01	0.06	0.03	0.00	0.00	0.00	0.09
DM100 Spatter Paint	6.89	0.0010	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bondaflex 100GP Sealant	8.59	1.1917	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sikaflex Sealant 221	10.60	1.0129	0.625	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	1.47	0.00	0.00	0.00	1.47
Sika Cleaner 226	6.70	0.0028	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Touch N Seal Foam	10.01	0.0347	0.625	0.00%	0.00%	0.00%	60.00%	0.00%	0.00%	0.00	0.00	0.00	0.57	0.00	0.00	0.57
AT-272 Sheet Vinyl Adhesive	10.00	0.1544	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ECK Corrosion Inhibitor	11.01	0.1352	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Russell 676 Spray Adhesive	5.84	0.3233	0.625	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	1.03	0.00	1.03
Temp-Coat 101	5.19	0.1287	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Seamfil 901	8.34	0.0062	0.625	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00	0.00	0.03	0.00	0.00	0.00	0.03
DegaBond 400	9.59	0.4495	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo C-31 Glass Cleaner	8.34	0.0207	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chem Tech Spray Adhesive	6.67	0.6912	0.625	0.00%	15.00%	0.00%	0.00%	15.00%	0.00%	0.00	1.89	0.00	0.00	1.89	0.00	3.79

Total Uncontrolled Potential Emissions **0.01 1.95 1.55 0.57 2.93 0.001 7.01**

METHODOLOGY

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

**MDI emissions assessed as worst case scenario however product VOC content is 0 g/L

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations -MMU**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Unit ID: Plant 1: Ambulance Undercoating (MMU)

Process/Coating	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	*Transfer Efficiency
Ground Rust Pr	7.30	47.00%	0.00%	47.00%	0.00%	53.00%	2.037	0.625	3.43	3.43	4.37	104.83	19.13	5.39	6.47	75%
Lacquer Thinner (Clean up Solvent)	6.80	100.00%	0.00%		0.00%	0.00%	0.250	0.625								
				100.00%					6.80	6.80	1.06	25.50	4.65	0.00	0.00	75%

*HVLP gun application

State Potential Emissions

5.43 130.33 23.79 5.39

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of worst case coatings in each booth

Appendix A: Emissions Calculations
HAP Emission Calculations MMU

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Swarna Prabha

Unit ID: Plant 1: Ambulance Undercoating (MMU)

Process/Coating	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total
Ground Rust Pr	7.30	2.03700	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.00	0.00	0.00	0.00	0.00
Acquer Thinn	6.80	0.25000	0.625	0.00%	60.00%	0.00%	10.00%	10.00%	0.0000	2.79	0.00	0.47	0.47	3.72
									0.00	2.79	0.00	0.47	0.47	3.72

Total Uncontrolled Potential Emissions

METHODOLOGY

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

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions MMC**

Page 17 of 28 TSD App A

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Swarna Prabha

Particulate Emissions from Plant 1: Carpenter Shop (MMC)

PM/PM10: 0.005 gr/acf outlet x 850 acf/min x 60 min/hr / 7000 gr/lb x 4.38 ton/yr / lb/hr / 0.01 (1- control efficiency) = **7.98 tons/yr (uncontrolled)**
where the total control efficiency is listed at 98.00% **0.16 tons/yr (controlled)**

Methodology:

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)
Particulate emissions are controlled by a cyclone with 98% control efficiency

Appendix A: Process Particulate Emissions

Woodworking Activities (WW1 & WW2)

Two (2) Table portable Saws Each Equipped with Dust Collection Units

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive and
 1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

626.00 lb/hr
 0.31 tons/hr
 3,000 acf/m 1,500 acfm each unit
 98.00% Percent
 0.002 grains/acf

grains/acf	X	acf/m	X	60 min/hr	X	1/7,000 grains/lb	=	lb/hr	
0.0020	X	3,000	X	60	X	0.00014	=	0.051428571	lb/hr
lb/hr	X	8,760 hr/year	X	1/2,000 lb/ton	=	tons/year			
0.05	X	8,760	X	0.0005	=	0.23		tons/year	

Particulates before control:

After Control Rate (tons/year)	/	[1 - Control Efficiency]	=	tons/year
0.23	/	0.0200	=	11.26

Process Rate tons/hr ^ 0.67	X	4.1	=	lb/hr
0.46	X	4.1	=	1.88

**Appendix A: Emissions Calculations
Buses Welding and Thermal Cutting (WMFD)**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
WELDING														
Metal Inert Gas (MIG)(E70S)	25	1.00	25.00	0.00520	0.00318	0.00001	0.00001	0.00001	0.13000	0.07950	0.00025	0.00025	0.00025	0.08025
Stick (E5154 electrode)	2	0.25	0.50	0.02410	0.00034	-	-	0.00010	0.01205	0.00017	-	-	0.00005	0.00022
Tungsten Inert Gas (TIG) (E70S)	25	1.00	25.00	0.00520	0.00318	0.00001	0.00001	0.00001	0.13000	0.07950	0.00025	0.00025	0.00025	0.08025
		Total Electrode	50.50											
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	4	0.25	1.25	0.1622	0.0005	0.0001	-	0.0003	0.01217	0.00004	0.00001	-	0.00002	0.00007
EMISSION TOTALS														
Potential Emissions lbs/hr									0.28	0.16	0.00	0.00	0.00	0.16
Potential Emissions lbs/day									6.82	3.82	0.01	0.01	0.01	3.86
Potential Emissions tons/year									1.24	0.6973	0.0022	0.0022	0.0025	0.70

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process code

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Welding Department Degreaser (WMFD)

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Non-VOC (Acetone)	Weight % Organics	Volume % Water & Non-VOC (Acetone)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water & Non-VOC	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Benders 20 Degreaser	8.57	87.00%	67.00%	20.00%	68.85%	10.00%	0.01191	1.150	5.50	1.71	0.02	0.56	0.10	0.00	17.14	100%

Potential to Emit **0.02 0.56 0.10 0.00**

***Hand or Manual Application**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

METHODOLOGY

This material does not contain Hazardous Air Pollutants

**Appendix A: Emissions Calculations
Ambulance Welding and Thermal Cutting, Plant 1**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Swarna Prabha**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel) [Mccoy Miller Plant]	21	1.8154		0.0075	0.001	0.0025	0.0015	0.286	0.038	0.095	0.057	0.191
Tungsten Inert Gas (TIG)(carbon steel) [Mccoy Miller Plant]	3	1.8154		0.0075	0.001	0.0025	0.0015	0.041	0.005	0.014	0.008	0.027
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma** [Mccoy Miller Plant]	3	0.375	150	0.0039				0.105	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.43	0.04	0.11	0.07	0.22
Potential Emissions tons/year								1.89	0.19	0.48	0.29	0.95

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

Appendix A: Emissions Calculations
Insignificant Activities - Miscellaneous Metal Fabrication and Foam Cutting TS1
CS1 Through CS18, MS1 AND MS2, BS1 through BS8 , and DP1 through DP4

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha

Metal Cutting

Process/Operation	Description	ID	Number of Units	Material Thickness (in)	Surface Thickness (in)	Process rate (in/hr/unit)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)	Throughput (lb material/hr)	Allowable Emission Rate (lb/hr)
Cutting	Chop Saws	CS1-CS18	18	0.179	0.0625	10.0	2.014	0.290	0.58	1500	3.38
Cutting	Mitre Saws	MS1-MS2	2	0.179	0.0625	10.0	0.224	0.290	0.06	500	1.62
Cutting	Vertical Bandsaw	BS1-BS8	8	0.179	0.031	5.00	0.222	0.290	0.06	500	1.62
Estimated Emissions (lb/hr)									0.71		6.62
Estimated Emissions (tons/yr)									3.12		

METHODOLOGY

Material Loss (in³/hr) = Number of Units x Material Thickness (in) X Surface Thickness (in) X Process Rate (in/hr/unit)
 Material Density (lbs/in³) = Data from O'Neal Steel, Inc. Stock List and Reference Book, 1999
 Estimated Emissions (lb/hr) = Material Loss (in³/hr) X Material Density (lb/in³)
 Estimated Emissions (tons/yr) = Material Loss (in³/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)
 Allowable Emission Rate (lb/hr) = 4.1 x [Throughput (lb/hr) x 1/2,000 (lb/ton)]^{0.67}

Metal Drilling -Drill Presses

Process/Operation	Description	ID	Number of Units	Material Thickness (in)	Drill Area (in ²)	Process Rate (holes/hr/unit)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)	Throughput (lb material/hr)	Allowable Emission Rate (lb/hr)
Drilling	Drill Press	DP1-DP4	4	0.179	0.200	5.00	0.716	0.290	0.21	500.000	1.62
Estimated Emissions (lb/hr)									0.21		1.62
Estimated Emissions (tons/yr)									0.91		

METHODOLOGY

Material Loss (in³/hr) = Number of Units x Material Thickness (in) X Drill Area (in²) X Process rate (holes/hr/unit)
 Other equations the same as above.

Foam Cutting

Process/Operation	Description	ID	Number of Units	Material Thickness (in)	Surface Thickness (in)	Process rate (in/hr/unit)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)	Throughput (lb material/hr)	Allowable Emission Rate (lb/hr)
Cutting	Table Saws	TS1-TS4	4	0.5	0.0625	24.0	3.000	0.040	0.12	25	0.22
Estimated Emissions (lb/hr)									0.12		0.22
Estimated Emissions (tons/yr)									0.53		

METHODOLOGY

Material Loss (in³/hr) = Number of Units x Material Thickness (in) X Surface Thickness (in) X Process Rate (in/hr/unit)
 Material Density (lbs/in³) = MSDS Density
 Estimated Emissions (lb/hr) = Material Loss (in³/hr) X Material Density (lb/in³)
 Estimated Emissions (tons/yr) = Material Loss (in³/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)
 Allowable Emission Rate (lb/hr) = 4.1 x [Throughput (lb/hr) x 1/2,000 (lb/ton)]^{0.67}

Total All Units

Estimated Emissions (lb/hr)	Material Loss (lb/hr)	Allowable Emission Rate (lb/hr)
1.04		8.46
4.56		

Appendix A: Emission calculations Plant 1

Company Name: Goshen Coach & Marque McCoy Miller
 Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
 Permit Number: M039-30375-00442
 Reviewer: Swarna Prabha

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Furnaces	2	H1-H2	0.050	0.9
Air Makeup Unit	1	H3	2.900	25.4
Furnaces	2	H4-H5	0.105	1.8
Furnaces	2	H6-H7	0.092	1.6
Radiant Heaters	19	H8-H26	0.105	17.5

Emission Factor (lbs/MMCF)							
PM	PM10*	direct PM2.5	SO2	NOX**	CO	VOC	HAPs
1.9	7.6	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)								
Emission Unit ID	PM	PM10	PM2.5	SO2	NOX	CO	VOC	HAPs
H1-H2	0.00	0.00	0.00	0.00	0.04	0.04	0.00	3.8E-05
H3	0.02	0.10	0.10	0.01	1.27	1.07	0.07	1.1E-03
H4-H5	0.00	0.01	0.01	0.00	0.09	0.08	0.01	8.0E-05
H6-H7	0.00	0.01	0.01	0.00	0.08	0.07	0.00	7.0E-05
H8-H26	0.02	0.07	0.07	0.01	0.87	0.73	0.05	7.6E-04
TOTALS	0.04	0.18	0.18	0.01	2.36	1.98	0.13	2.1E-03

*PM emission factors are filterable.

PM10 and PM2.5 emission factors are for condensable and filterable combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu 1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

METHODOLOGY

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.

Greenhouse Gas Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000.00	2.3	2.2
Potential Emission in tons/yr			
Furnaces H1-H2	52.56	0.001	0.001
Air Makeup Unit H3	1,524.24	0.03	0.03
Furnaces H4-H5	110.38	0.002	0.002
Furnaces H6-H7	96.71	0.00	0.00
Radiant Heaters H8-H26	1,048.57	0.02	0.02
Summed Potential Emissions in tons/year			
Summed PTE Furnaces	52.56		
Summed PTE Air Makeup Unit	1,524.30		
Summed PTE Furnaces	110.38		
Summed PTE Furnaces	96.71		
Summed PTE Radiant Heaters	1,048.61		
CO2e Total in tons/yr			
CO2e Furnaces	52.88		
CO2e PTE Air Makeup Unit	1,533.52		
CO2e PTE Furnaces	111.05		
CO2e PTE Furnaces	97.30		
CO2e PTE radiant Heaters	1,054.95		
Total	2,849.70		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x

CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations MMP- Plant2**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Unit ID: Plant 1: Ambulance prime and paint booths (MMP)

Material Name	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating *	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids **	Controlled Efficiency	Controlled PM Emmisions (tons/yr)	Transfer Efficiency
Polyurethane Primer	2.71	1.00	0.375	2.71	1.02	24.43	4.46	6.70	8.16	99%	0.067	50%
C. R. Primer	3.99	1.50	0.375	3.99	2.24	53.82	9.82	9.50	7.71	99%	0.095	50%
Clear Coat	4.40	2.00	0.375	4.40	3.30	79.18	14.45	5.88	3.58	99%	0.059	50%
White Base	5.19	1.00	0.375	5.19	1.95	46.69	8.52	0.87	1.06	99%	0.009	50%
Red Base	5.19	1.00	0.375	5.19	1.95	46.69	8.52	0.87	1.06	99%	0.009	50%
Ditzo Remover	6.00	0.06	0.625	6.00	0.22	5.31	0.97	0.00	0.00	99%	0.000	50%
Acryli-clean	6.36	0.08	0.625	6.36	0.33	8.01	1.46	0.00	0.00	99%	0.000	50%
Base (Striping)	5.19	0.03	0.625	5.19	0.10	2.49	0.45	0.05	1.06	99%	0.000	50%

State Potential Emissions **266.63 48.66 23.86 0.24**

Note:
* VOC density or Pounds VOC per gallon of coating less water was pre-calculated and provided by the source because all coatings consist of mixtures of multiple coatings.
** lb VOC/gal solids was pre-calculated and provided by the source because all coatings consist of mixtures of multiple coatings.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of worst case coatings in each booth

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations MMP Plant 2

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Swarna Prabha

Plant 1: Body Shop Operations (MMP)

Body shop operations have three possible modes of generating air emissions. First, approximately two pounds of body putty are hand applied to the vehicle and (while still soft) cut fair with the body with a knife. Body putty is basically Plaster of Paris. This inorganic material emits no volatile organic compounds or HAPs upon application or in curing. After the putty cures, about 10% by weight is removed by standing. We can assume that this 0.2 pounds per vehicle is particulate matter. Finally, the vehicle is prepared for priming by wiping with a lacquer thinner. Approximately 0.75 gallons of thinner is used per vehicle. Van-type ambulances are not sent through the body shop as a matter of course. All chasis-box ambulances are run through the body shop prior to priming. Therefore, the body shop throughput is 0.375 vehicles per hour.

I. Body Putty:

The inorganic body putty emits no particulates, volatile organic compounds, or HAPs, since it contains none of these pollutants.

Emissions
VOC = 0
PM = 0

II. Sanding

The putty is fully reacted when sanding starts, therefore is no further volatile emissions

Emissions
VOC = 0
PM = 2.0 lb/ambulance x 10% removed x 0.375 ambulance/hr = 0.075 lb/hr or
0.3285 tons/yr

III. Surface Preparation

Lacquer thinner is 100% volatile, therefore there are no PM emissions from this step.

Emissions
VOC = 0.75 gal/ambulance x 6.8 lb/gal (density) x 0.375 ambulance / hr = 1.913 lb/hr or
PM = 0
8.37 tons/yr

**Appendix A: Emissions Calculations
HAP Emission Calculations MMP plant 2**

**Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
1110 DI Drive, Elkhart, Indiana 46514
Permit Number: M039-30375-00442
Reviewer: Swarna Prabha**

Unit ID: Plant 2: Ambulance prime and paint booths (MMP)

Process/Coating ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total
Polyurethane Primer	2.71	1.00000	0.375	0.00%	0.00%	36.25%	9.00%	0.00%	0.000	0.00	1.62	0.40	0.00	2.02
C. R. Primer	3.99	1.50000	0.375	0.00%	0.00%	23.75%	0.00%	0.00%	0.000	0.00	2.33	0.00	0.00	2.33
Clear Coat	4.40	2.00000	0.375	0.00%	4.00%	20.75%	0.00%	0.00%	0.000	0.58	3.00	0.00	0.00	3.58
White Base	5.19	1.00000	0.375	0.00%	56.50%	6.25%	0.00%	0.00%	0.000	4.81	0.53	0.00	0.00	5.35
Red Base	5.19	1.00000	0.375	0.00%	0.00%	6.25%	0.00%	0.00%	0.000	0.00	0.53	0.00	0.00	0.53
Ditzo Remover	6.00	0.05900	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
Acryli-clean	6.36	0.08400	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
Base (Striping)	5.19	0.03200	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
									0.00	5.39	8.01	0.40	0.00	13.81

Total Uncontrolled Potential Emissions

METHODOLOGY

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only - Plant 2
MM BTU/HR <100**

Company Name: Goshen Coach & Marque McCoy Miller
Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-30375-00442
Reviewer: Swarna Prabha

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
5.12	44.9	
Mccoy Miller Plant		Total (MMBtu/hr)
Forty one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu per hour		4.10
One (1) natural gas fired box heater rated at 0.15 MMBtu per hour		0.15
Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu per hour		0.87
		5.12

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	Direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
					**see below		
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.24	0.12	1.88

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

*Direct PM2.5 is filterable and condensable combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only - plant 2
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

**Company Name: Goshen Coach & Marque McCoy Miller
 Address City IN Zip: 25161 Leer Drive, and
 1110 DI Drive, Elkhart, Indiana 46514
 Permit No.: F039-30375-00442
 Reviewer: Swarna Prabha**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.709E-05	2.691E-05	1.682E-03	4.037E-02	7.625E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.121E-05	2.467E-05	3.140E-05	8.522E-06	4.709E-05

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120000	2.3	2.2
Potential Emission in tons/yr	2691.072	0.05157888	0.04933632
Summed Potential Emissions in tons/yr	2691.172915		
CO2e Total in tons/yr	2707.449416		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Gretchen K Neeser
Goshen Coach & Marque McCoy Miller
25161 Leer Dr
Elkhart, IN 46514

DATE: November 1, 2011

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP
039-30375-00442

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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Toll Free (800) 451-6027
www.idem.IN.gov

November 1, 2011

TO: Elkhart Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Goshen Coach & Marque McCoy Miller
Permit Number: 039-30375-00442

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

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5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
6		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
7		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
8		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
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