



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

TO: Interested Parties / Applicant

DATE: June 18, 2013

RE: Lochmandy Technical Group Commercial Division/039-32757-00738

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.dot 6/13/13



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Michael R. Pence  
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*Commissioner*

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


**Lochmandy Technical Group Commercial Division  
1318 W Bristol Street and  
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.: F039-32757-00738	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 18, 2013 Expiration Date: June 18, 2018



## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Source Definition	
A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.5 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>6</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.7 Severability [326 IAC 2-8-4(4)]	
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.14 Emergency Provisions [326 IAC 2-8-12]	
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.18 Permit Renewal [326 IAC 2-8-3(h)]	
B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.21 Source Modification Requirement [326 IAC 2-8-11.1]	
B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>16</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

**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]
- C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**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]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

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

- D.1.1 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8]
- D.1.2 Volatile Organic Compounds (VOC) Limitation [326 IAC 8-1-6]
- D.1.3 Particulate [326 IAC 6-3-2(d)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2(a)]
- D.1.6 Particulate Control

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

- D.1.7 Monitoring

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

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

**E.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 26**

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements**

- E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
- E.1.2 National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]

Certification Form..... 28  
Emergency Occurrence Form..... 29  
Quarterly Report Form: HAP Input (Booths B1, B2, and B3)..... 31  
Quarterly Report Form: VOC Input, Booth B1 ..... 32  
Quarterly Report Form: VOC Input, Booth B2 ..... 33  
Quarterly Report Form: VOC Input, Booth B3 ..... 34  
Quarterly Deviation and Compliance Monitoring Report Form..... 35  
Affidavit of Construction ..... 37

Attachment A: NESHAP Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources)

## 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)]

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The Permittee owns and operates a stationary paint shop coating original equipment manufacturer (OEM) recreational vehicles. This operation engages in custom painting of motor homes and travel trailers for RV manufacturers, as part of the RV manufacturing process.

Source Address:	1318 W Bristol Street, Elkhart, IN 46514
General Source Phone Number:	(574) 264-1089
SIC Code:	3716 (Motor Homes)
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)]

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

- (a) One (1) surface coating spray booth, identified as B1, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S1.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (b) One (1) surface coating spray booth, identified as B2, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S2.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (c) One (1) surface coating spray booth, identified as B3, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S3.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

Note: B1, B2 and B3 apply coatings to original equipment manufacturer (OEM) recreational vehicles and recreational vehicle parts which have not had initial coatings applied at OEM plant coating assembly lines.

A.4 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:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired air make-up unit, identified as AM1, approved for construction in 2013, with a maximum heat input capacity of 1.50 MMBtu/hr, using no control, and exhausting indoors.
  - (2) Two (2) natural gas-fired air make-up units, identified as AM2 and AM3, approved for construction in 2013, with a maximum heat input capacity of 3.00 MMBtu/hr, each, using no control, and exhausting indoors.
- (b) Paved roads and parking lots.

A.5 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]**

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- 
- (a) This permit, F039-32757-00738, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

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

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

**B.7 Severability [326 IAC 2-8-4(4)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

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

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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

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- (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.12 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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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.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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- (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.14 Emergency Provisions [326 IAC 2-8-12]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation 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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F039-32757-00738 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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.18 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.22 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]**

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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 two hundred fifty (250) 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]

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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]

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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]

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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]

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- (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]**

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- (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]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

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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)]**

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- (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]**

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

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

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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. Support information includes the following:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) surface coating spray booth, identified as B1, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S1.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (b) One (1) surface coating spray booth, identified as B2, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S2.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (c) One (1) surface coating spray booth, identified as B3, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S3.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

Note: B1, B2 and B3 apply coatings to original equipment manufacturer (OEM) recreational vehicles and recreational vehicle parts which have not had initial coatings applied at OEM plant coating assembly lines.

(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 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall limit the input of any single HAP to the three (3) surface coating spray booths (B1, B2, and B3) to less than 9.90 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAP (Glycol Ethers) from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the three (3) surface coating spray booths (B1, B2, and B3) shall be limited as follows:

- (a) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B1 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.
- (b) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B2 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.



- (c) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B3 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from each of the three (3) surface coating spray booths (B1, B2, and B3) to less than twenty-five (25) tons per 12 consecutive month period, each, and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

**D.1.3 Particulate [326 IAC 6-3-2(d)]**

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Particulate from the surface coating spray booths (B1, B2, and B3) shall each be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan is required for the surface coating spray booths (B1, B2, and B3) and their fabric filters. 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.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2(a)]**

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Compliance with the VOC and HAPs input limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(2) 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.1.6 Particulate Control**

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In order to comply with condition D.1.3, the fabric filters for PM control shall be in operation and control emissions from the surface coating spray booths at all times that the surface coating spray booths are in operation.

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

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the surface coating spray booth (B1-B3) filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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 a 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.1.8 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1 and D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP (single and combined) input for each month and each compliance period; and
  - (5) The weight of total VOC and HAP (single and combined) input for each month and each compliance period.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily 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.1.9 Reporting Requirements**

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Quarterly summaries of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with no regard to the reporting required by this condition. The reports submitted by the Permittee 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).

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) surface coating spray booth, identified as B1, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S1.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (b) One (1) surface coating spray booth, identified as B2, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S2.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (c) One (1) surface coating spray booth, identified as B3, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S3.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

Note: B1, B2 and B3 apply coatings to original equipment manufacturer (OEM) recreational vehicles and recreational vehicle parts which have not had initial coatings applied at OEM plant coating assembly lines.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

#### E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1 for the affected facilities as specified in Appendix A of 40 CFR Part 63, Subpart HHHHHH in accordance with the schedule in 40 CFR 63 Subpart HHHHHH.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

#### E.1.2 National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment B) for the affected facilities:

- (1) 40 CFR 63.11169  
(2) 40 CFR 63.11170(a)(2) and (b)

- (3) 40 CFR 63.11171
- (4) 40 CFR 63.11172
- (5) 40 CFR 63.11173(e) and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177(a) through (d), (g), (h)
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738

**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: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738  
Facility: Surface Coating Spray Booths (B1, B2, and B3)  
Parameter: Single HAP input  
Limit: The input of any single HAP to the three (3) spray booths (B1, B2, and B3) shall be less than 9.90 tons per twelve (12) consecutive month period, total, 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: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738  
Facility: Surface Coating Spray Booth B1  
Parameter: VOC input  
Limit: The input of VOC to the surface coating spray booth B1 shall be less than 24.9 tons per twelve (12) consecutive month period combined, 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: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738  
Facility: Surface Coating Spray Booth B2  
Parameter: VOC input  
Limit: The input of VOC to the surface coating spray booth B2 shall be less than 24.9 tons per twelve (12) consecutive month period combined, 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: Lochmandy Technical Group Commercial Division  
Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
FESOP Permit No.: F039-32757-00738  
Facility: Surface Coating Spray Booth B3  
Parameter: VOC input  
Limit: The input of VOC to the surface coating spray booth B3 shall be less than 24.9 tons per twelve (12) consecutive month period combined, 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  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lochmandy Technical Group Commercial Division  
 Source Address: 1318 W Bristol Street, Elkhart, IN 46514  
 FESOP Permit No.: F039-32757-00738

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

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Lochmandy Technical Group Commercial Division  
1318 W Bristol Street, Elkhart, IN 46514

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Lochmandy Technical Group Commercial Division 1318 Bristol Street, Elkhart, Indiana 46514, completed construction of the paint shop coating original equipment manufacturer (OEM) recreational vehicles on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 23, 2013 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F039-32757-00738, Plant ID No. 039-00738 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Lochmandy Technical Group Commercial Division  
1318 W Bristol Street and  
Elkhart, Indiana 46514

**Attachment A**

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR  
POLLUTANTS FOR SOURCE CATEGORIES

SUBPART HHHHHH

National Emission Standards for Hazardous Air Pollutants: Paint Stripping  
and Miscellaneous Surface Coating Operations at Area Sources

**Permit No. F039-32757-00738**

## **Title 40: Protection of Environment**

### **PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES**

#### **Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

**Source:** 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

#### **What This Subpart Covers**

##### **§ 63.11169 What is the purpose of this subpart?**

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

- (a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
- (b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
- (c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.
  - (1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
  - (2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
  - (3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.
  - (4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.
  - (5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.
  - (6) Surface coating or paint stripping activities that are covered under another area source NESHAP.



### **§ 63.11170 Am I subject to this subpart?**

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

- (1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.
- (2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.
- (3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

### **§ 63.11171 How do I know if my source is considered a new source or an existing source?**

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

- (1) Mixing rooms and equipment;
- (2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;
- (3) Spray guns and associated equipment;
- (4) Spray gun cleaning equipment;
- (5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
- (6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun

cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

## **General Compliance Requirements**

### **§ 63.11172 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

### **§ 63.11173 What are my general requirements for complying with this subpart?**

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart

occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is

demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs

(g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

#### **§ 63.11174 What parts of the General Provisions apply to me?**

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

#### **Notifications, Reports, and Records**

##### **§ 63.11175 What notifications must I submit?**

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

### **§ 63.11176 What reports must I submit?**

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

### **§ 63.11177 What records must I keep?**

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

#### **§ 63.11178 In what form and for how long must I keep my records?**

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

#### **Other Requirements and Information**

#### **§ 63.11179 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

#### **§ 63.11180 What definitions do I need to know?**

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

*Additive* means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

*Administrator* means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

*Aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.



*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Architectural coating* means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- (3) Adhesives, sealants, maskants, or caulking materials.
- (4) Temporary protective coatings, lubricants, or surface preparation materials.
- (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Compliance date* means the date by which you must comply with this subpart.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

*Dry media blasting* means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

*Electrostatic application* means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

*Equipment cleaning* means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated

mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*High-volume, low-pressure (HVLP) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

*Initial startup* means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

*Materials that contain HAP or HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Miscellaneous parts and/or products* means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

*Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

*Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

*Paint stripping and/or miscellaneous surface coating source or facility* means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

*Paint stripping* means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

*Painter* means any person who spray applies coating.

*Plastic* refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

*Protective oil* means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Quality control activities* means surface coating or paint stripping activities that meet all of the following criteria:

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
- (4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

*Research and laboratory activities* means surface coating or paint stripping activities that meet one of the following criteria:

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
- (2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

*Solvent* means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

*Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

*Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Surface preparation* or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

*Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

*Target HAP containing coating* means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

*Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

*Truck bed liner coating* means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

**Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63**

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

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

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

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Lochmandy Technical Group Commercial Division</b>
<b>Source Location:</b>	<b>1318 W Bristol Street, Elkhart, IN 46514</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3716 (Motor Homes)</b>
<b>Operation Permit No.:</b>	<b>F039-32757-00738</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

On January 23, 2013, the Office of Air Quality (OAQ) received an application from Lochmandy Technical Group Commercial Division related to the construction and operation of a new a stationary paint shop coating original equipment manufacturer (OEM) recreational vehicles.

<b>Source Definition</b>
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Lochmandy Motors, Inc. is an automotive dealership that paints cars under SSOA 039-9833-00500.

The Lochmandy Technical Group plant, source ID 039-00738, is a new plant that will do custom painting. The two Lochmandy plants will be about 100 feet apart. Manufacturing plants in the Elkhart area will send motor homes and travel trailers to the Lochmandy Technical Group plant for custom painting.

IDEM, OAQ has examined whether these plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two or more 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 another; and,
- (3) the plants must be located on the same, contiguous or adjacent properties.

**The Lochmandy Plants**

IDEM will first determine if the two Lochmandy plants meet the major source definition.

- (a) **Common ownership**  
The Lochmandy plants are owned by separate corporations. IDEM's Nonrule Policy Document Air-005 is guidance for applying the definition of major source. It states that if two plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of both plants, then common ownership exists. One individual, Craig Lochmandy, owns more than 51% of each Lochmandy plant. Therefore, the two Lochmandy plants are under common ownership, meeting the first part of the major source definition.
- (b) **SIC code**  
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](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.



The Lochmandy Motors plant does mainly painting for automotive repairs. It has the two-digit SIC Code 75, for the Major Group Automotive Repair, Services, and Parking.

The Lochmandy Technical Group plant will paint mainly motor homes prior to the completion of their manufacturing process. It will 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. The Lochmandy plants will not provide any output to the other. Neither plant will meet the definition of a support facility. Since the plants do not have the same two-digit SIC Code and do not support each other, the second part of the major source definition is not met.

(c) Contiguous or adjacent properties

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are not located on the same or contiguous properties. Therefore IDEM must determine if the plants are located on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term "adjacent" when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent" as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are "adjacent" going back to the preamble to the 1980 NSR program definition of "major source". U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source".

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

- (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?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

The two Lochmandy plants will be located on properties that are about 100 feet apart. There will be no materials routinely transferred between the plants. The plants will not share production workers. The plants will share a manager who will be actively involved in both plants. The production process will not be split in any way between the plants. The two plants are physically quite close to each other. Considering all these factors, IDEM, OAQ finds that the plants are located on adjacent properties and meet the third part of the major source definition.

(d) Conclusion

The Lochmandy plants do not meet all three elements of the major source definition. Therefore, IDEM, OAQ finds that the Lochmandy Motor, Inc. plant and the Lochmandy Technical Group plant are not part of the same major source.

### **The Lochmandy Technical Group Plant and the Motor Home Manufacturing Plants**

IDEM will now determine if the Lochmandy Technical Group paint plant and the motor home and travel trailer manufacturing plants meet the major source definition.

(a) Common Ownership

The Lochmandy plant intends to do contract painting for many of the motor home and travel trailer manufacturers in the Elkhart area. The Lochmandy plant is owned by a corporation that is unrelated to the corporations that own the manufacturing plants. IDEM's Nonrule Policy Document Air-005 is guidance for applying the definition of major source. It states that if two plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of both plants, then common ownership exists. The manufacturing plants and the Lochmandy plant do not have common corporate officers or a common majority owner. Therefore no common ownership exists.

Where there is no common ownership, IDEM's Nonrule Policy Document Air-005 sets out two independent tests to determine if common control exists. The first test, the auxiliary activity test, determines whether one plant performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- is a majority of the output of the auxiliary activity provided to the primary activity?
- can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?
- can the primary activity assume control of the auxiliary activity under certain circumstances?
- is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The Lochmandy plant's business plan is to bid on contracts offered by the motor home and travel trailer manufacturing plants. The Lochmandy plant will not dedicate a majority of its painting work to any single manufacturing plant. It will be bidding on painting contracts, depending on which manufacturing plant has contracts out for bid. The manufacturing plants contract out mainly for custom external painting. No manufacturing plant will send a majority of its output to the Lochmandy plant.

The Lochmandy plant will be free to enter into painting contracts with any manufacturing plant. No manufacturing plant will have the power to assume control of the Lochmandy plant under any circumstances. The Lochmandy plant will not be required to submit any periodic reports to any

manufacturing plant. IDEM finds that no manufacturing plant will have a major role in the day to day operation of the Lochmandy plant. Therefore the first common control test is not met.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. Due to the number of motor home and travel trailer manufacturing plants in the Elkhart area, the Lochmandy plant does not plan on providing a majority of its painting work to any single manufacturing plant. None of the manufacturing plants will send a majority of their output to the Lochmandy plant. Therefore the second common control test is also not met.

IDEM finds that the Lochmandy plant and the manufacturing plants are not under common control. Since neither common ownership nor common control exists, the first part of the definition of major source is not met.

(b) SIC Code

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](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

The Lochmandy Technical Group plant will paint motor homes and travel trailers prior to the completion of the manufacturing process. It will have the two-digit SIC Code 37, for the Major Group Transportation Equipment.

The motor home and travel trailer manufacturing plants have the same two-digit SIC Code, 37.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The Lochmandy plant will not dedicate 50% or more of its painting output to any single manufacturing plant. No single manufacturing plant will provide 50% or more of its output to the Lochmandy plant. None of the plants will meet the definition of a support facility. However, since the plants will have the same two-digit SIC Code, the second part of the major source definition is met.

(c) Contiguous or adjacent properties

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are not located on the same or contiguous properties. Therefore IDEM must determine if the plants are located on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term "adjacent" when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent" as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis

used to determine if two sources are “adjacent” going back to the preamble to the 1980 NSR program definition of “major source”. U.S. EPA’s consistent approach is that any evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

- (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?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA’s view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

There will be materials routinely transferred between the plants, as the Lochmandy plant will paint motor homes and travel trailers manufactured at the other plants. The motor home manufacturing plants will transport the motor homes and travel trailers to the Lochmandy plant and transport them back to the manufacturing plant after painting. The plants will not share production workers, as the manufacturing plant employees will not do any painting at the Lochmandy plant. The plants will not share any managers.

The production process will be split between the plants for those motor homes and trailers that require custom painting. Since the Lochmandy plant has not yet contracted with any specific manufacturing plant, the percentage of motor homes and trailers from any one manufacturing plant to be painted at the Lochmandy plant is not known. However, since the Lochmandy plant plans to paint for several manufacturing plants, it will paint significantly less than 50% of the total motor homes and travel trailers produced at any single manufacturing plant. All the permitted motor home and travel trailer manufacturers in the Elkhart area are located between 2 and 5 miles from the Lochmandy plant. Considering all these factors, IDEM, OAQ has determined the Lochmandy plant and the manufacturing plants will not be located on adjacent properties. Therefore, the third part of the major source definition is not met.

- (d) **Conclusion**  
Since all three parts of the major source definition are not met, IDEM, OAQ finds that the Lochmandy Technical Group plant and the motor home and travel trailer manufacturing plants are not part of the same major source. This determination is based on the current business plan and may be reviewed in the future to determine if the plants are operating as planned.

<b>Existing Approvals</b>
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There have been no previous approvals issued to Lochmandy Technical Group Commercial Division.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (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<sub>2.5</sub>**  
 Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**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 New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lochmandy Technical Group Commercial Division on January 23, 2012, relating to the construction and operation of a stationary paint shop coating original equipment manufacturer (OEM) recreational vehicles. This operation engages in custom painting of motor homes and travel trailers for RV manufacturers, as part of the RV manufacturing process.

The following is a list of the new emission unit(s) and pollution control device(s):

- (a) One (1) surface coating spray booth, identified as B1, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S1.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (b) One (1) surface coating spray booth, identified as B2, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S2.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (c) One (1) surface coating spray booth, identified as B3, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S3.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

Note 1: Each of the three (3) coating booths (B1, B2, and B3) is capable of applying primer coat, basecoat, or clear coat as mutually exclusive coatings.

Note 2: B1, B2 and B3 apply coatings to original equipment manufacturer (OEM) recreational vehicles and recreational vehicle parts which have not had initial coatings applied at OEM plant coating assembly lines.

#### **Insignificant Activities**

The following is a list of the insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) One (1) natural gas-fired air make-up unit, identified as AM1, approved for construction in 2013, with a maximum heat input capacity of 1.50 MMBtu/hr, using no control, and exhausting indoors.
  - (2) Two (2) natural gas-fired air make-up units, identified as AM2 and AM3, approved for construction in 2013, with a maximum heat input capacity of 3.00 MMBtu/hr, each, using no control, and exhausting indoors.
- (b) Paved roads and parking lots.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP**

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.

Pollutant	Potential To Emit (tons/year)
PM	26.15
PM10 <sup>(1)</sup>	25.78
PM2.5	25.68
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.22
VOC	94.54
CO	2.71
GHGs as CO <sub>2</sub> e	3,888.23

(1) 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".

HAPs	Potential To Emit (tons/year)
Glycol Ethers	13.87
Xylene	7.47
Ethylbenzene	2.89
Hexane	0.06
<b>TOTAL HAPs</b>	<b>13.93</b>

- (a) The PTE of all regulated criteria pollutants are less than one hundred (100) tons per year.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP (Glycol Ethers) is greater than ten (10) tons per year and the PTE of a combination of HAPs is less 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.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

**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	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Spray Booth 1	8.47	8.47	8.47	0.00	0.00	24.9***	0.00	0.00	4.62	<9.90 Glycol Ethers
Spray Booth 2	8.47	8.47	8.47	0.00	0.00	24.9***	0.00	0.00	4.62	
Spray Booth 3	8.47	8.47	8.47	0.00	0.00	24.9***	0.00	0.00	4.62	
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.22	0.18	2.71	3,888.23	0.06	0.06
Paved Roads (Fugitive)	0.68	0.13	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>26.67</b>	<b>26.38</b>	<b>26.29</b>	<b>0.03</b>	<b>4.78</b>	<b>78.60</b>	<b>4.02</b>	<b>3,888.23</b>	<b>13.93</b>	<b>&lt;9.90 Glycol Ethers</b>
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

\*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 CO<sub>2</sub>e 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.  
 \*\*\* B1, B2 and B2 are limited such that 326 IAC 8-1-6 does not apply to each booth.

(a) FESOP Status

This new 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 new 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 the potential to emit HAPs is less than 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) The input of any single HAP to the three (3) surface coating spray booths (B1, B2, and B3) shall be less than 9.90 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit Glycol Ethers from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Note: There is no need to limit the total HAPs because the unlimited PTE is less than 25 tons per year.



- (b) PSD Minor Source  
This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all 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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) Emission Offset Minor Source  
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because Elkhart County is an attainment county. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since each of the natural gas combustion units is not considered a steam generating unit as defined by 40 CFR 60.41c and each unit has a heat input capacity less than 10 million British thermal units per hour (MMBtu/hr)
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source is not a automobile or light-duty truck assembly plant.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source is not located or part of a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not located or part of a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not located or part of a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Coating Manufacturing, 40 CFR 63.7980, Subpart HHHHH (326 IAC 20-88), are not included in the permit, since this source does not own or operate a miscellaneous coating manufacturing operation as defined in 40 CFR 63.7985(b).
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since this source is not located or part of a major source of HAPs.

- (i) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, pursuant to 40 CFR 63.1170(a)(2), because it is an area source of HAP and performs the spray application of coatings, as defined in 40 CFR 63.11180, to motor vehicles and mobile equipment.

Note: If you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in 40 CFR 63.11180.

The facilities subject to this rule include the following:

- (a) One (1) surface coating spray booth, identified as B1, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S1.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (b) One (1) surface coating spray booth, identified as B2, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S2.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

- (c) One (1) surface coating spray booth, identified as B3, approved for construction in 2013, equipped with HVLP application guns, with a maximum capacity of coating 0.25 offsite preassembled recreational vehicles (RVs) per hour, using dry filters as particulate control, and exhausting to stack S3.

Under 40 CFR Part 63, Subpart HHHHHH, this paint booth is considered an affected facility.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170(a)(2) and (b)
- (3) 40 CFR 63.11171
- (4) 40 CFR 63.11172
- (5) 40 CFR 63.11173(e) and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177(a) through (d), (g), (h)
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

Note: No performance testing is required by NESHAP Subpart HHHHHH.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ, are not included in the permit, since the air make-up units are not considered boilers and are all fueled by natural gas and therefore exempt from this subpart as defined in 40 CFR 63.11195.
- (k) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

- (l) 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.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 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.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the new unit(s) is greater than ten (10) tons per year for any single HAP. However, the source shall limit the potential to emit of HAPs from the new units to less than ten (10) tons per year for any single HAP; the unlimited potential to emit of the new units is 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.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 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:
  - (1) 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.
  - (2) 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.

- (f) 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.
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### Surface Coating Spray Booths

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(15), the three (3) surface coating spray booths (B1, B2, and B3) are each subject to the requirements of 326 IAC 6-3, since they each have the potential to use equal to or greater than five (5) gallons per day of coatings. Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating spray booths (B1, B2, and B3) shall each be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited VOC potential emissions from the three (3) surface coating spray booths (B1, B2, and B3) is each greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the each of three (3) surface coating spray booths (B1, B2, and B3) to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the three (3) surface coating spray booths (B1, B2, and B3) shall be limited as follows:

- (1) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B1 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.
- (2) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B2 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.
- (3) The input of VOC, including coatings, dilution solvents, and cleaning solvents, to the surface coating spray booth B3 shall be less than 24.9 tons per twelve (12) consecutive month period combined, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from each of the three (3) surface coating spray booths (B1, B2, and B3) to less than twenty-five (25) tons per 12 consecutive month period, each, and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (k) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operation)  
Pursuant to 326 IAC 8-2-2, each of the three (3) surface coating spray booths (B1, B2, and B3) are not subject to 326 IAC 8-2-2, because this source is not an automobile and/or light duty truck assembly plant.

- (l) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)  
Pursuant to 326 IAC 8-2-9, each of the three (3) surface coating spray booths (B1, B2, and B3) at Plant 1 are not subject to 326 IAC 8-2-9, because, pursuant to 326 IAC 8-2-9(b)(4), this source does customized top coating of less than ten vehicles (motor homes) per day. Also, the substrates consist primarily (>90%) of fiber reinforced plastic composites.

Maximum capacity =  $(0.25 \text{ RV/hour}) \times (24 \text{ hrs/day}) = 6 \text{ RV/day}$

- (m) 326 IAC 8-10 (Automobile Refinishing)  
The requirements of 326 IAC 8-10 apply to any person who owns, leases, operates, or controls a facility, as defined in 326 IAC 1-2-27, that refinishes motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment in any Indiana county. This source does not perform refinishing operations for after-market motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment. The source applies coatings to original equipment manufacturer (OEM) recreational vehicles and recreational vehicle parts which have not had initial coatings applied at OEM plant coating assembly lines. This is a part of the RV manufacturing process, and this source operates under SIC Code 3716. Therefore, the requirements of 326 IAC 8-10 are not applicable to the three (3) surface coating spray booths (B1, B2, and B3)
- (n) There are no other 326 IAC 8 Rules that are applicable the three (3) surface coating spray booths (B1, B2, and B3).

#### Natural Gas-Fired Air Make-Up Units and Heaters

- (o) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The natural gas-fired combustion units are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

### **Compliance Determination, Monitoring and Testing Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit	Control	Parameter	Frequency	Range	Excursions and Exceedances
Surface Coating Spray Booths (B1, B2, and B3)	dry filters	Filter inspection	Daily	Normal-Abnormal	Response Steps
		Stack exhaust inspection	Weekly		
		Presence of overspray	Monthly		

- (b) There are no testing requirements applicable to this source.

**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 January 23, 2013. Additional information was received on March 7, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 039-32757-00738. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
SUMMARY OF EMISSIONS**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Pit ID: 039-00738  
Reviewed By: Sarah Street**

Uncontrolled Potential to Emit (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Spray Booth 1	8.47	8.47	8.47	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Spray Booth 2	8.47	8.47	8.47	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Spray Booth 3	8.47	8.47	8.47	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.22	0.18	2.71	3,888.23	0.06	0.06 Hexane
Paved Roads (Fugitive)	0.68	0.13	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>26.15</b>	<b>25.78</b>	<b>25.68</b>	<b>0.02</b>	<b>3.22</b>	<b>94.54</b>	<b>2.71</b>	<b>3,888.23</b>	<b>13.93</b>	<b>13.87 Glycol Ethers*</b>
Title V PTE Thresholds	100	100	100	100	100	100	100	100,000	25	10

Note: The source uses Acetone (a non-regulated material) as cleanup for the spray booths

\*Worst Case Xylene HAPs = 7.47 tons/yr  
\*Worst Cast Ethylbenzene HAPs = 2.87 tons/yr

Controlled Potential to Emit (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Spray Booth 1	0.42	0.42	0.42	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Spray Booth 2	0.42	0.42	0.42	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Spray Booth 3	0.42	0.42	0.42	0.00	0.00	31.45	0.00	0.00	4.62	4.62 Glycol Ethers
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.22	0.18	2.71	3,888.23	0.06	0.06 Hexane
Paved Roads (Fugitive)	0.62	0.13	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>1.95</b>	<b>1.64</b>	<b>1.56</b>	<b>0.02</b>	<b>3.22</b>	<b>94.54</b>	<b>2.71</b>	<b>3,888.23</b>	<b>13.93</b>	<b>13.87 Glycol Ethers</b>

Note: Spray Booths 1, 2, and 3 are each controlled by dry filters

Limited Potential to Emit (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Spray Booth 1	8.47	8.47	8.47	0.00	0.00	24.90	0.00	0.00	4.62	9.90 Glycol Ethers
Spray Booth 2	8.47	8.47	8.47	0.00	0.00	24.90	0.00	0.00	4.62	
Spray Booth 3	8.47	8.47	8.47	0.00	0.00	24.90	0.00	0.00	4.62	
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.22	0.18	2.71	3,888.23	0.06	0.06 Hexane
Paved Roads (Fugitive)	0.68	0.13	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>26.15</b>	<b>25.78</b>	<b>25.68</b>	<b>0.02</b>	<b>3.22</b>	<b>74.88</b>	<b>2.71</b>	<b>3,888.23</b>	<b>13.93</b>	<b>9.90 Glycol Ethers</b>

Note: Each spray booth is limited to < 24.9 tons/yr of VOC to render the requirements of 326 IAC 8-1-6 (BACT) not applicable  
The three spray booths are limited to less than 9.90 tons/yr of single HAP (Glycol Ethers) to render the requirements of 326 IAC 2-7 (Part 70) not applicable

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations (Booth 1)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
PIT ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

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*	Particulate Control Efficiency
<b>Booth 1</b>																	
385014 Anti-Static Cleaner	6.53	99.00%	0.0%	99.00%	0.00%	1.16%	0.125	0.250	6.46	6.46	0.202	4.85	0.88	0.00	557.30	100%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.250	0.250	2.91	2.91	0.182	4.36	0.80	0.46	4.99	70%	
387005 Primer	7.00	98.82%	0.0%	98.82%	0.00%	1.20%	0.500	0.250	6.92	6.92	0.865	20.75	3.79	0.01	576.45	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.125	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
									<b>Totals:</b>	<b>Uncontrolled</b>	<b>1.25</b>	<b>29.96</b>	<b>5.47</b>	<b>0.47</b>			
									<b>Controlled</b>	<b>1.25</b>	<b>29.96</b>	<b>5.47</b>	<b>2.37E-02</b>				

**Basecoat Application**

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*	Particulate Control Efficiency
<b>Booth 1</b>																	
391063 Reducer	7.31	100.00%	0.0%	100.00%	0.00%	0.00%	1.100	0.250	7.31	7.31	2.010	48.25	8.80	0.00	N/A	70%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.462	0.250	2.91	2.91	0.336	8.06	1.47	0.85	4.99	70%	
391082 Binder	7.67	82.87%	0.0%	82.87%	0.00%	13.74%	0.750	0.250	6.36	6.36	1.192	28.60	5.22	0.32	46.26	70%	
398266 Toner	11.81	39.57%	0.0%	39.57%	0.00%	37.07%	0.188	0.250	4.67	4.67	0.220	5.27	0.96	0.44	12.61	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
									<b>Totals:</b>	<b>Uncontrolled</b>	<b>3.76</b>	<b>90.18</b>	<b>16.46</b>	<b>1.62</b>			
									<b>Controlled</b>	<b>3.76</b>	<b>90.18</b>	<b>16.46</b>	<b>0.08</b>				

**Clearcoat Application**

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*	Particulate Control Efficiency	
<b>Booth 1</b>																		
385062 Activator	7.41	85.00%	0.0%	85.00%	0.00%	12.44%	1.900	0.250	6.30	6.30	2.990	71.76	13.10	0.69	50.60	70%	95%	
391654 Autoclear	7.91	45.32%	2.2%	43.12%	2.63%	49.09%	3.850	0.250	3.50	3.41	3.283	78.79	14.38	5.47	6.95	70%		
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	1.250	0.250	2.91	2.91	0.908	21.80	3.98	2.31	4.99	70%		
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%		
									<b>Totals:</b>	<b>Uncontrolled</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>				
									<b>Controlled</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>0.42</b>					
											<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>			
											<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>0.42</b>			

**Note:**

Paint Preparation, Basecoat Application, and Clearcoat are mutually exclusive operations  
\*Transfer Efficiency = 70% for HVLP Application of Coatings and 100% for Hand Application of Pre-Cleaner and Cleanup Solvent

**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)



**Appendix A: Emission Calculations  
HAP Emission Calculations (Booth 1)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Plt ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 1</b>										
385014 Anti-Static Cleaner	6.53	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
387005 Primer	7.00	0.500	0.250	65.00%	0.00%	25.00%	2.49	0.00	0.96	3.45
Acetone (Cleanup)	6.61	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>2.49</b>	<b>0.00</b>	<b>0.96</b>	<b>3.45</b>

**Basecoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 1</b>										
391063 Reducer	7.31	1.100	0.250	0.00%	5.00%	0.00%	0.00	0.44	0.00	0.44
398765 XP Hardener	8.52	0.462	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
391082 Binder	7.67	0.750	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398266 Toner	11.81	0.188	0.250	5.00%	0.00%	1.00%	0.12	0.00	0.02	0.15
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.12</b>	<b>0.44</b>	<b>0.02</b>	<b>0.59</b>

**Clearcoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 1</b>										
385062 Activator	7.41	1.900	0.250	0.00%	30.00%	0.00%	0.00	4.62	0.00	4.62
391654 Autoclear	7.91	3.850	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	1.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.00</b>	<b>4.62</b>	<b>0.00</b>	<b>4.62</b>

<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>
<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>

**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 (Booth 2)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Plt ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

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*	Particulate Control Efficiency
<b>Booth 2</b>																	
385014 Anti-Static Cleaner	6.53	99.00%	0.0%	99.00%	0.00%	1.16%	0.125	0.250	6.46	6.46	0.202	4.85	0.88	0.00	N/A	100%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.250	0.250	2.91	2.91	0.182	4.36	0.80	0.00	4.99	100%	
387005 Primer	7.00	98.82%	0.0%	98.82%	0.00%	1.20%	0.500	0.250	6.92	6.92	0.865	20.75	3.79	0.01	576.45	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.125	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>1.25</b>	<b>29.96</b>	<b>5.47</b>	<b>0.01</b>			

**Basecoat Application**

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*	Particulate Control Efficiency
<b>Booth 2</b>																	
391063 Reducer	7.31	100.00%	0.0%	100.00%	0.00%	0.00%	1.100	0.250	7.31	7.31	2.010	48.25	8.80	0.00	N/A	70%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.462	0.250	2.91	2.91	0.336	8.06	1.47	0.85	4.99	70%	
391082 Binder	7.67	82.87%	0.0%	82.87%	0.00%	13.74%	0.750	0.250	6.36	6.36	1.192	28.60	5.22	0.32	46.26	70%	
398266 Toner	11.81	39.57%	0.0%	39.57%	0.00%	37.07%	0.188	0.250	4.67	4.67	0.220	5.27	0.96	0.44	12.61	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>3.76</b>	<b>90.18</b>	<b>16.46</b>	<b>1.62</b>			

**Clearcoat Application**

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*	Particulate Control Efficiency	
<b>Booth 2</b>																		
385062 Activator	7.41	85.00%	0.0%	85.00%	0.00%	12.44%	1.900	0.250	6.30	6.30	2.990	71.76	13.10	0.69	N/A	70%	95%	
391654 Autoclear	7.91	45.32%	2.2%	43.12%	2.63%	49.09%	3.850	0.250	3.50	3.41	3.283	78.79	14.38	5.47	6.95	70%		
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	1.250	0.250	2.91	2.91	0.908	21.80	3.98	2.31	4.99	70%		
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%		
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>				
<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>											<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>				
<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>											<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>0.42</b>				

**Note:**

Paint Preparation, Basecoat Application, and Clearcoat are mutually exclusive operations  
\*Transfer Efficiency = 70% for HVLP Application of Coatings and 100% for Hand Application of Pre-Cleaner and Cleanup Solvent

**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)

**Appendix A: Emission Calculations  
HAP Emission Calculations (Booth 2)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Pit ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 2</b>										
385014 Anti-Static Cleaner	6.53	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
387005 Primer	7.00	0.500	0.250	65.00%	0.00%	25.00%	2.49	0.00	0.96	3.45
Acetone (Cleanup)	6.61	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>2.49</b>	<b>0.00</b>	<b>0.96</b>	<b>3.45</b>

**Basecoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 2</b>										
391063 Reducer	7.31	1.100	0.250	0.00%	5.00%	0.00%	0.00	0.44	0.00	0.44
398765 XP Hardener	8.52	0.462	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
391082 Binder	7.67	0.750	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398266 Toner	11.81	0.188	0.250	5.00%	0.00%	1.00%	0.12	0.00	0.02	0.15
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.12</b>	<b>0.44</b>	<b>0.02</b>	<b>0.59</b>

**Clearcoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 2</b>										
385062 Activator	7.41	1.900	0.250	0.00%	30.00%	0.00%	0.00	4.62	0.00	4.62
391654 Autoclear	7.91	3.850	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	1.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.00</b>	<b>4.62</b>	<b>0.00</b>	<b>4.62</b>

<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>
<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>

**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 (Booth 3)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Plt ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

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*	Particulate Control Efficiency
<b>Booth 3</b>																	
385014 Anti-Static Cleaner	6.53	99.00%	0.0%	99.00%	0.00%	1.16%	0.125	0.250	6.46	6.46	0.202	4.85	0.88	0.00	N/A	100%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.250	0.250	2.91	2.91	0.182	4.36	0.80	0.00	4.99	100%	
387005 Primer	7.00	98.82%	0.0%	98.82%	0.00%	1.20%	0.500	0.250	6.92	6.92	0.865	20.75	3.79	0.01	576.45	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.125	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>1.25</b>	<b>29.96</b>	<b>5.47</b>	<b>0.01</b>			

**Basecoat Application**

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*	Particulate Control Efficiency
<b>Booth 3</b>																	
391063 Reducer	7.31	100.00%	0.0%	100.00%	0.00%	0.00%	1.100	0.250	7.31	7.31	2.010	48.25	8.80	0.00	N/A	70%	95%
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	0.462	0.250	2.91	2.91	0.336	8.06	1.47	0.85	4.99	70%	
391082 Binder	7.67	82.87%	0.0%	82.87%	0.00%	13.74%	0.750	0.250	6.36	6.36	1.192	28.60	5.22	0.32	46.26	70%	
398266 Toner	11.81	39.57%	0.0%	39.57%	0.00%	37.07%	0.188	0.250	4.67	4.67	0.220	5.27	0.96	0.44	12.61	70%	
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%	
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>3.76</b>	<b>90.18</b>	<b>16.46</b>	<b>1.62</b>			

**Clearcoat Application**

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*	Particulate Control Efficiency	
<b>Booth 3</b>																		
385062 Activator	7.41	85.00%	0.0%	85.00%	0.00%	12.44%	1.900	0.250	6.30	6.30	2.990	71.76	13.10	0.69	N/A	70%	95%	
391654 Autoclear	7.91	45.32%	2.2%	43.12%	2.63%	49.09%	3.850	0.250	3.50	3.41	3.283	78.79	14.38	5.47	6.95	70%		
398765 XP Hardener	8.52	34.11%	0.0%	34.11%	0.00%	58.19%	1.250	0.250	2.91	2.91	0.908	21.80	3.98	2.31	4.99	70%		
Acetone (Cleanup)	6.61	100.00%	100.0%	0.00%	100.00%	0.00%	0.250	0.250	#DIV/0!	0.00	0.000	0.00	0.00	0.00	N/A	100%		
<b>Totals:</b>									<b>Uncontrolled</b>	<b>Controlled</b>	<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>				
<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>											<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>8.47</b>				
<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>											<b>7.18</b>	<b>172.35</b>	<b>31.45</b>	<b>0.42</b>				

**Note:**

Paint Preparation, Basecoat Application, and Clearcoat are mutually exclusive operations  
\*Transfer Efficiency = 70% for HVLP Application of Coatings and 100% for Hand Application of Pre-Cleaner and Cleanup Solvent

**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)

**Appendix A: Emission Calculations  
HAP Emission Calculations (Booth 3)**

**Company Name: Lochmandy Technical Group Commercial Division  
Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514  
Permit No.: F039-32757-00738  
Plt ID: 039-00738  
Reviewed By: Sarah Street**

**Paint Preparation**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 3</b>										
385014 Anti-Static Cleaner	6.53	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
387005 Primer	7.00	0.500	0.250	65.00%	0.00%	25.00%	2.49	0.00	0.96	3.45
Acetone (Cleanup)	6.61	0.125	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>2.49</b>	<b>0.00</b>	<b>0.96</b>	<b>3.45</b>

**Basecoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 3</b>										
391063 Reducer	7.31	1.100	0.250	0.00%	5.00%	0.00%	0.00	0.44	0.00	0.44
398765 XP Hardener	8.52	0.462	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
391082 Binder	7.67	0.750	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398266 Toner	11.81	0.188	0.250	5.00%	0.00%	1.00%	0.12	0.00	0.02	0.15
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.12</b>	<b>0.44</b>	<b>0.02</b>	<b>0.59</b>

**Clearcoat Application**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Booth 3</b>										
385062 Activator	7.41	1.900	0.250	0.00%	30.00%	0.00%	0.00	4.62	0.00	4.62
391654 Autoclear	7.91	3.850	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
398765 XP Hardener	8.52	1.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Acetone (Cleanup)	6.61	0.250	0.250	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Totals:</b>							<b>0.00</b>	<b>4.62</b>	<b>0.00</b>	<b>4.62</b>

<b>Maximum Potential to Emit for Worst Case Coating Operation Before Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>
<b>Maximum Potential to Emit for Worst Case Coating Operation After Control</b>	<b>2.49</b>	<b>4.62</b>	<b>0.96</b>	<b>4.62</b>

**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**

**Company Name: Lochmandy Technical Group Commercial Division**  
**Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514**  
**Permit No.: F039-32757-00738**  
**Plt ID: 039-00738**  
**Reviewed By: Sarah Street**

Heat Input Capacity MMBtu/hr	Potential Throughput MMcf/yr	Emission Unit ID	Description
1.50	12.88	AM1	One (1) Air Makeup Unit, 1.50 MMBTU/hr
3.00	25.76	AM2	One (1) Air Makeup Unit, 3.00 MMBTU/hr
3.00	25.76	AM3	One (1) Air Makeup Unit, 3.00 MMBTU/hr
<b>7.50</b>	<b>64.41</b>		

Emission Factor (lb/MMcf)	Pollutant						
	PM*	PM <sub>10</sub> *	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emissions (tons/yr)	0.06	0.24	0.24	0.02	3.22	0.18	2.71

\* PM emission factor is filterable PM only. PM<sub>10</sub> and PM<sub>2.5</sub> emission factors are filterable and condensable PM combined.

\*\* Emission factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMcf = 1,000,000 Cubic Feet of Gas

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.

**Methodology:**

Potential Throughput (MMcf/yr) = Heat Input Capacity (MMBtu/hr) \* 8,760 hrs/yr / 1,020 MMBtu/MMcf

Potential Emissions (tons/yr) = Throughput (MMcf/yr) \* Emission Factor (lb/MMcf) / 2,000 lb/ton

**Hazardous Air Pollutant Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.763E-05	3.865E-05	2.415E-03	5.797E-02	1.095E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.610E-05	3.543E-05	4.509E-05	1.224E-05	6.763E-05

**Combined HAPs: 0.06**

**Methodology:**

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 (lb/MMcf)	Greenhouse Gas		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
	120000	2.3	2.2
Potential Emissions (tons/yr)	3,865	0.07	0.07
Summed Potential Emissions (tons/yr)	3,865		
CO <sub>2</sub> e Total (tons/yr)	3,888		

The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2.

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) are from Table A-1 of 40 CFR Part 98 Subpart A.

**Methodology:**

Potential Emissions (tons/yr) = Throughput (MMcf/yr) \* Emission Factor (lb/MMcf) ÷ 2,000 lb/ton

CO<sub>2</sub>e (tons/yr) = CO<sub>2</sub> Potential Emission (tons/yr) \* CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission (tons/yr) x CH<sub>4</sub> GWP (21) + N<sub>2</sub>O Potential Emission (tons/yr) x N<sub>2</sub>O GWP (310)

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: Lochmandy Technical Group Commercial Division**  
**Address City IN Zip: 1318 Bristol Street, Elkhart, IN 46514**  
**Permit No.: F039-32757-00738**  
**Plt ID: 039-00738**  
**Reviewed By: Sarah Street**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Recreational Vehicles (RVs) - Entering	22.0	1.0	22.0	21.2	466.4	230	0.044	1.0	349.8
Recreational Vehicles (RVs) - Leaving	22.0	1.0	22.0	21.2	466.4	230	0.044	1.0	349.8
<b>Total</b>			<b>44.0</b>		<b>932.8</b>			<b>1.9</b>	<b>699.6</b>

Average Vehicle Weight Per Trip =  $\frac{21.2}{1}$  tons/trip  
 Average Miles Per Trip =  $\frac{0.04}{1}$  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	21.2	21.2	21.2	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	1.960	0.392	0.0962	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	1.792	0.358	0.0880	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Recreational Vehicles (RVs) - Entering	0.34	0.07	0.02	0.31	0.06	0.02
Recreational Vehicles (RVs) - Leaving	0.34	0.07	0.02	0.31	0.06	0.02
	<b>0.68</b>	<b>0.13</b>	<b>0.03</b>	<b>0.62</b>	<b>0.13</b>	<b>0.04</b>

**Methodology:**

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
- Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

**Abbreviations:**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particle Matter (<2.5 um)
- PTE = Potential to Emit



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Mike Depositar  
Lochmandy Technical Group Commercial Division  
1318 W Bristol Street  
Elkhart, IN 46514

**DATE:** June 18, 2013

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

**SUBJECT:** Final Decision  
Federally Enforceable State Operating Permit  
039-32757-00738

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:  
Doug Elliott, D & B Environmental Services, Inc.  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013





# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

June 18, 2013

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: Lochmandy Technical Group Commercial Division**  
**Permit Number: 039-32757-00738**

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 6/13/2013

# Mail Code 61-53

IDEM Staff	PWAY 6/18/2013 Lochmandv Technical Group Commercial Division 039-32757-00738 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		Mike Depositar Lochmandy Technical Group Commercial Division 1318 W Bristol St Elkhart IN 46514 (Source CAATS)										
2		Central Investment Co Limited 11818 L Street Omaha NE 68137 (Affected Party)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
8		Elkhart Products Crop 1255 Oak Street Elkhart IN 46514 (Affected Party)										
9		Loch Venture, LLC 920 N Nappanee Street Elkhart IN 46514 (Affected Party)										
10												
11												
12												
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