

## 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 Carol S. Comer Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Signficant Modification to a Part 70 Operating Permit

for Rev Recreation Group, Inc. in Adams County

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025

The Indiana Department of Environmental Management (IDEM) has received an application from Rev Recreation Group, Inc., located at 1031 U.S. 224 East, Decatur, IN 46733, for a significant modification of its Part 70 Operating Permit issued on April 21, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Rev Recreation Group, Inc. to make certain changes at its existing source. Rev Recreation Group, Inc. has applied to add a clear coat operation and associated sanding.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Decatur Public Library 128 S. 3rd Street Decatur, IN 46733

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you



do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 001-37527-00025 and SPM 001-37552-00025 in all correspondence.

#### Comments should be sent to:

Kristen Willoughby IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 3-3031 Or dial directly: (317) 233-3031 Fax: (317) 232-6749 attn: Kristen Willoughby

E-mail: kwilloug@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

## What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Kristen Willoughby of my staff at the above address.

Jenny Acker, Section Chief

Permits Branch Office of Air Quality



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## DRAFT

Mr. Tim Quinton Rev Recreation Group, Inc. 1031 U.S. 224 East, P.O. Box 31 Decatur, IN 46733

Re: 001-37552-00025

Significant Permit Modification to

Part 70 Renewal No.: T001-34744-00025

Dear Mr. Quinton:

Rev Recreation Group, Inc. was issued Part 70 Operating Permit Renewal No. T T001-34744-00025 on April 21, 2015 for a stationary motor home manufacturing plant located at 1031 U.S. 224 East, Decatur, IN 46733. An application requesting changes to this permit was received on August 18, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: RESERVED

Attachment B: 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture

**Manufacturing Operations** 

Attachment C: 40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air

Pollutants for Surface Coating of Plastic Parts and Products

Attachment D: 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air

Pollutants for Stationary Reciprocating Internal Combustion Engines

Attachment E: 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air

Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and

**Process Heaters** 

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: <a href="http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\_02.tpl">http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\_02.tpl</a>.

A copy of the permit is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.



Rev Recreation Group, Inc. Decatur, Indiana Permit Reviewer: Kristen Willoughby Page 2 of 2 SPM No. 001-37552-00025

## **DRAFT**

If you have any questions on this matter, please contact Kristen Willoughby, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-3031 or 1-800-451-6027, and ask for extension 3-3031.

Sincerely,

Jenny Acker, Section Chief Permits Branch Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Adams County

Adams County Health Department

U.S. EPA, Region 5

Compliance and Enforcement Branch



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## DRAFT

# Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

## Rev Recreation Group, Inc. 1031 U.S. 224 E. Decatur, Indiana 46733

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

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

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

Operation Permit No.: T001-34744-00025	
Issued by: Original Signed	Issuance Date: April 21, 2015
Jenny Acker, Section Chief	
Permits Branch, Office of Air Quality	Expiration Date: April 21, 2020
Permits Branch, Office of Air Quality	Expiration Date: April 21, 2020

Administrative Amendment No.: 001-37238-00025, issued July 14, 2016

Significant Permit Modification No.: 001-37552-00025		
Issued by:	Issuance Date:	
Jenny Acker, Section Chief Permits Branch Office of Air Quality	Expiration Date: April 21, 2020	



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#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary motor home manufacturing plant.

Source Address: 1031 U.S. 224 E., Decatur, Indiana 46733

General Source Phone Number: (260) 728-3074 SIC Code: 3716 (Motor Homes)

County Location: Adams

Source Location Status:

Source Status:

Attainment for all criteria pollutants
Part 70 Operating Permit Program
Major Source, under PSD Rules

Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) motor home painting operation utilizing HVLP or equivalent application methods, constructed in 1989, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with a maximum capacity of 1.25 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (b) One (1) adhesive application operation utilizing HVLP or equivalent application methods, constructed in 1989, identified as spray booth 4A, with a maximum capacity of 3.7 lbs adhesive per hour applied on wood substrate, using dry filters as control, and exhausting to stack 4A.
- (c) One (1) wood-fired boiler, identified as HY-400-200, constructed in 1993 and derated in 2016, with a maximum rated heat input capacity of 18.49 MMBtu/hr, and a derated heat input capacity of 9.9 MMBtu/hr, using a cyclone as control, and exhausting to stack 10A.

Under 40 CFR 63, Subpart DDDDD, this is an existing industrial boiler.

- (d) Surface coating booths for wood cabinets:
  - (1) Three (3) surface coating booths for wood cabinets, constructed in 2013, identified as EU1-9, EU1-10 and EU1-11, each with a maximum capacity of 6.70 units per hour, using HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-9, SV1-10 and SV1-11, respectively. Each surface coating booth has an associated natural gas-fired process heater, identified as EUF1-9, EUF1-10, and EUF1-11, respectively, with a maximum capacity of 0.02 MMBtu/hour, each.

#### Significant Permit Modification No. 001-37552-00025 Modified by: Kristen Willoughby DRAFT

(2) One (1) surface coating booth for wood cabinets, constructed in 2014, identified as EU1-12, with a maximum capacity of 4.00 units per hour, using hand wipe and HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-12. This surface coating booth has an associated natural gas-fired process heater, identified as EUF1-12, with a maximum capacity of 0.02 MMBtu/hour.

The four (4) surface coating booths are considered new affected sources under 40 CFR 63, Subpart JJ.

NOTE: These (4) four surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, are collectively bottlenecked due to the amount of wood cabinets produced at the source, with a maximum capacity to coat 6.70 units per hour.

- (e) One (1) woodworking mill room, constructed in 2013, identified as D1-02, with a maximum capacity of 2,240 pounds of wood per hour, using an integral baghouse, identified as DV1-02, providing particulate control and exhausting indoors, consisting of the following emission units:
  - (1) Two (2) chop saws
  - (2) Three (3) radial arm saws
  - (3) One (1) drill mill
  - (4) One (1) bandsaw
  - (5) One (1) notching machine
  - (6) One (1) belt sander
  - (7) One (1) slotting machine
  - (8) One (1) overhead router
  - (9) One (1) vertical panel saw
- (f) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:
  - (1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.
    - Under 40 CFR 63, Subpart PPPP this is an affected unit.
  - One (1) natural gas fired air make-up unit heater for PB#8, with a maximum heat input of 8.3 MMBtu/hr.
  - (3) One (1) prep sanding operation consisting of six (6) hand sanders, collectively identified as Sand and individually identified as CC Sanding 1 through CC Sanding 6, with a total bottleneck capacity of 1.25 units per hour, with emissions controlled by portable dust collectors (Portable-1 through Portable -6), and exhausting inside.

## A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Activities associated with emergencies as follows:
  - (1) Emergency generators as follows:
    - (A) Natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower, as follows: [40 CFR 63, Subpart ZZZZ]
      - (i) One (1) natural gas fired emergency generator, constructed in 1988, with a maximum output capacity of 95 horsepower.
  - (2) Stationary fire pump engines, as follows. [40 CFR 63, Subpart ZZZZ]
    - (A) One (1) diesel fired emergency fire pump, constructed in 1988, with a maximum output capacity of 235 horsepower.

## A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Combustion related activities, as follows:
  - (1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:
    - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Fuel dispensing activities as follows:
  - (1) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons, as follows:
    - (A) One (1) above ground gasoline storage tank, constructed before 2000, with a maximum capacity of 550 gallons.
    - (B) One (1) above ground gasoline storage tank, constructed in 2014, with a maximum capacity of 1,000 gallons.

The combined throughput of the two tanks is less than 84,000 gallons per year.

- (c) Production related activities, including the following:
  - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

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- (A) Brazing equipment.
- (B) Cutting torches.
- (C) Soldering equipment.
- (D) Welding equipment.
- (2) Infrared cure equipment.
- (d) Water based activities, including the following:
  - (1) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
- (e) Repair activities, including the following:
  - (1) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (f) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following:
  - (1) Purging of gas lines.
  - (2) Purging of vessels.
- (g) Blowdown for the following:
  - (1) Sight glass.
  - (2) Boiler.
  - (3) Cooling tower.
  - (4) Compressors.
  - (5) Pumps.

## A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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#### **SECTION B**

#### **GENERAL CONDITIONS**

### B.1 Definitions [326 IAC 2-7-1]

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

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

- (a) This permit, T001-34744-00025, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

## B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

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

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

#### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

#### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

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- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

## B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 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

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification:
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

## B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - 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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - Ouring 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 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

(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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

## B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

## B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T001-34744-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-

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5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

## B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

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subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

## B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

## B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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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 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

### B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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## B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

## B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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.3 Open Burning [326 IAC 4-1][IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

## C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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. The
  requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

## C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
  - Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
  - 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 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, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

## C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (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 2-7-5][326 IAC 2-7-6]

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Rev Recreation Group, Inc.

Decatur, Indiana

Permit Reviewer: Doug Logan

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## C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

- C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]
  - (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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
      - 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.

(II)

- (a) CAM Response to excursions or exceedances.
  - Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal

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without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
  The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
  - Failed to address the cause of the control device performance problems;
     or
  - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) CAM recordkeeping requirements.
  - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality

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improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

## C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

  Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue MC 61-50 IGCN 1003 Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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## C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

- (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, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(00) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

## C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken:
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

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(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(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) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

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Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## **Stratospheric Ozone Protection**

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

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

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

## **Emissions Unit Description:**

- (a) One (1) motor home painting operation utilizing HVLP or equivalent application methods, constructed in 1989, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with a maximum capacity of 1.25 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (b) One (1) adhesive application operation utilizing HVLP or equivalent application methods, constructed in 1989, identified as spray booth 4A, with a maximum capacity of 3.7 lbs adhesive per hour applied on wood substrate, using dry filters as control, and exhausting to stack 4A.

(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 2-7-5(1)]

## D.1.1 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 2-2-3][326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 2-2-3 (PSD BACT) and 326 IAC 8-1-6, the spray/curing operations (2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B) and adhesive application operation 4A doing graphics stripping, logo painting, adhesive application, finish coating, front cap painting, rear cap painting, and skirt painting shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for these operations shall be as follows:
  - (1) The total VOC input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, including the use of coatings, thinners, and clean-up solvents, shall be limited to less than 320 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
  - (2) The VOC content for the coatings as applied at these booths shall not exceed the limits listed in the table below:

Type of Coating	VOC Content Limit (lbs/gal of applied coating)
Clear Coat	3.5
Repair Clear Coat	3.5
Base Coat	6.2
Adhesive	3.5

- (3) The use of HVLP spray applications or its equivalent for spray coating operations.
- (4) Motor home exteriors shall be hand-wiped with cleaning solvent prior to painting.
- (5) Good work practices to minimize leaks, spills and evaporative losses, which includes, but not limited, to the following:

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- (A) Storing solvent and solvent soaked rags in closed containers.
- (B) Sealing lids on all containers not in use or in storage.
- (C) The purging of guns and lines into approved containers.
- (D) Maintaining an organized spill response and clean-up operation.
- (E) Performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks,
- (F) The use of solvent recovery systems to recover reusable solvents for onsite or off-site recycling.
- (G) Using aqueous, exempt solvents or citric cleaners where effective and practical.

#### D.1.2 PSD Minor Limits [326 IAC 2-2]

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

- (a) The total coating solids input to spray booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B, shall be less than 214 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The transfer efficiency of the spray guns shall be no less than 65%.
- (c) The control efficiency of the dry filters shall be at least 80%.

Compliance with the above limit, combined with the potential to emit PM/PM10 from other emission units at the source, shall limit the PM/PM10 from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the booth 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B stacks (2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A and 7B) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (2A, 2B, 2C, 2D, 3B, 4A, 4B, 6A, 6B, 7A and 7B) while one or more of the booths are in operation. If a condition exists which should result in a response, 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 required by this condition. Failure to take a reasonable response 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 emission is observed, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

#### D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2 (a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits, the coating solid usage limit, and the VOC content limit established in Conditions D.1.1 and D.1.2(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The coating solid content of each coating material;
  - (3) The total VOC and coating solid usage for each month;
  - (4) The weight of VOCs emitted for each compliance period;
  - (5) The total coating solid usage for each compliance period;
- (b) To document the compliance status with Conditions D.1.3 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its daily record when an observation or inspection is not made and the reason for the lack of an observation or inspection (e.g., the process did not operate that day).
- (c) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### D.1.8 Reporting Requirements

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later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

(c) One (1) wood-fired boiler, identified as HY-400-200, constructed in 1993 and derated in 2016, with a maximum rated heat input capacity of 18.49 MMBtu/hr, and a derated heat input capacity of 9.9 MMBtu/hr, using a cyclone as control, and exhausting to stack 10A.

Under 40 CFR 63, Subpart DDDDD, this is an existing industrial boiler.

(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 2-7-5(1)]

#### D.2.1 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Boiler HY-400-200 shall be limited to 0.6 pounds per MMBtu heat input.

#### D.2.2 Type of Wood Used [326 IAC 2-2][326 IAC 4-2]

Pursuant to CP 001-3020-00025 (issued on November 2, 1993), in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 4-2 (Incinerators) not applicable, the Permittee shall burn only the following fuels in Boiler HY-400-200:

- (a) Clean wood, and/or
- (b) Plywood.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board and oriented strand board).

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.2.4 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.2, the Permittee shall perform PM, PM10, and PM2.5 testing of Boiler HY-400-200 utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

#### D.2.5 Wood Inspections

In order to demonstrate compliance with Condition D.2.2, the Permittee shall perform visual inspections of all wood received at Boiler HY-400-200 for combustion at the time of delivery to collection area. Inspections shall be conducted by trained plant personnel. The inspections shall be conducted to ensure that the material being fed to Boiler HY-400-200 does not contain any of the following material:

- (a) Treated, painted or coated wood-based material; or
- (b) Non-wood material (i.e., plastic, fiberglass, metal, rubber, etc.)

Any materials listed above shall be rejected and discarded.

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

#### D.2.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records on a daily basis of all visual wood inspections, and the results of each inspection. The records shall include the date of inspection and name of person performing the inspection. The Permittee shall include in its daily record when inspections are not made for the day and the reason for the lack of inspections, (e.g. Boiler HY-400-200 was not in operation or did not receive any loads to the collection area that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (d) Surface coating booths for wood cabinets:
  - (1) Three (3) surface coating booths for wood cabinets, constructed in 2013, identified as EU1-9, EU1-10 and EU1-11, each with a maximum capacity of 6.70 units per hour, using HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-9, SV1-10 and SV1-11, respectively. Each surface coating booth has an associated natural gas-fired process heater, identified as EUF1-9, EUF1-10, and EUF1-11, respectively, with a maximum capacity of 0.02 MMBtu/hour, each.
  - (2) One (1) surface coating booth for wood cabinets, constructed in 2014, identified as EU1-12, with a maximum capacity of 4.00 units per hour, using hand wipe and HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-12. This surface coating booth has an associated natural gas-fired process heater, identified as EUF1-12, with a maximum capacity of 0.02 MMBtu/hour.

The four (4) surface coating booths are considered new affected sources under 40 CFR 63, Subpart JJ.

NOTE: These (4) four surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, are collectively bottlenecked due to the amount of wood cabinets produced at the source, with a maximum capacity to coat 6.70 units per hour.

(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 2-7-5(1)]

#### D.3.1 VOC [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, within the four (4) HVLP surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, shall utilize one (1) or more of the following application systems:

Airless Spray Application System
Air-Assisted Airless Spray Application System
Electrostatic Spray Application System
Electrostatic Bell or Disc Application System
Heated Airless Spray Application System
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

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#### D.3.2 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the four (4) surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12 shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.3.4 Particulate Control

In order to assure compliance with Condition D.3.2, the dry filters for particulate control shall be in operation and control emissions from the four (4) surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, at all times the units are in operation.

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

#### D.3.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating EU1-9, EU1-10, EU1-11, and EU1-12 stacks (SV1-9, SV1-10, SV1-11, and SV1-12) while one or more of the booths are in operation. If a condition exists which should result in a response, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

#### D.3.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its daily record when an observation or inspection is not made and the reason for the lack of an observation or inspection (i.e. the process did not operate that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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#### SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (e) One (1) woodworking mill room, constructed in 2013, identified as D1-02, with a maximum capacity of 2,240 pounds of wood per hour, using an integral baghouse, identified as DV1-02, providing particulate control and exhausting indoors, consisting of the following emission units:
  - (1) Two (2) chop saws
  - (2) Three (3) radial arm saws
  - (3) One (1) drill mill
  - (4) One (1) bandsaw
  - (5) One (1) notching machine
  - (6) One (1) belt sander
  - (7) One (1) slotting machine
  - (8) One (1) overhead router
  - (9) One (1) vertical panel saw

(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 2-7-5(1)]

#### D.4.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the one (1) woodworking mill room, identified as D1-02, controlled by baghouse DV1-02, shall not exceed the following limits:

- (a) The PM emission rate from the one (1) woodworking mill room, identified as D1-02, controlled by baghouse DV1-02, shall not exceed 2.00 pounds per hour.
- (b) The PM<sub>10</sub> emission rate from the one (1) woodworking mill room, identified as D1-02, controlled by baghouse DV1-02, shall not exceed 2.00 pounds per hour.
- (c) The PM<sub>2.5</sub> emission rate from the one (1) woodworking mill room, identified as D1-02, controlled by baghouse DV1-02, shall not exceed 2.00 pounds per hour.

Compliance with these emission limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of PM per year and less than fifteen (15) tons of PM<sub>10</sub> per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

#### D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.4.3 Particulate Control

- (a) In order to assure compliance with Condition D.4.1 and to ensure the woodworking mill room is exempt from the requirements of 326 IAC 6-3-2, the baghouse (DV1-02) for particulate control shall be in operation and control emissions from the woodworking mill room facility at all times the woodworking mill room facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.4.4 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across baghouse (DV1-02) at least once per day when the associated woodworking mill room is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.4.5 Broken or Failed Bag Detection

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

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

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

#### D.4.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.4, the Permittee shall maintain daily records of pressure drop across the baghouse. The Permittee shall include in its

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daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (f) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:
  - (1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.
    - Under 40 CFR 63, Subpart PPPP this is an affected unit.
  - (2) One (1) natural gas fired air make-up unit heater for PB#8, with a maximum heat input of 8.3 MMBtu/hr.
  - (3) One (1) prep sanding operation consisting of six (6) hand sanders, collectively identified as Sand and individually identified as CC Sanding 1 through CC Sanding 6, with a total bottleneck capacity of 1.25 units per hour, with emissions controlled by portable dust collectors (Portable-1 through Portable -6), and exhausting inside.

(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 2-7-5(1)]

#### D.5.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The VOC input to PB#8 shall not exceed 39.70 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM10 emissions from the prep sanding operations, CC Sanding 1 through CC Sanding 6, shall each not exceed 0.15 lbs/hour.
- (c) The PM2.5 emissions from the prep sanding operations, CC Sanding 1 through CC Sanding 6, shall each not exceed 0.15 lbs/hour.

Compliance with these limits, shall limit the potential to emit from SSM No. 001-37527-00025 of  $PM_{10}$  to less than fifteen (15) tons per twelve (12) consecutive month period,  $PM_{2.5}$  to less than ten (10) tons per twelve (12) consecutive month period, and VOC to less than forty (40) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

#### D.5.2 VOC Minor Limit [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall comply with the following:

The VOC input to PB#8 shall not exceed 24.70 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in conjunction with the potential to emit from the air make-up heater for PB#8, shall limit the potential to emit from the clear coat operation of VOC to less than twenty-five

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(25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

#### D.5.3 Particulate Emission Limitations [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from PB#8 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.5.5 Particulate Control

- (a) In order to assure compliance with Condition D.5.1, the dust collectors for PM10 and PM2.5 control shall be in operation and control emissions from the prep sanding operation, CC Sanding 1 through CC Sanding 6, at all times the prep sanding operation, CC Sanding 1 through CC Sanding 6, is in operation.
- (b) In order to assure compliance with Condition D.5.3, the dry filters for particulate control shall be in operation and control emissions from the paint booth PB#8 at all times the paint booth PB#8 is in operation.

#### D.5.6 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.5.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth PB#8 stacks PB8-1 and PB8-2 while the booth is in operation. If a condition exists which should result in a response, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

#### D.5.8 Dust Collector Inspections

The Permittee shall perform quarterly inspections of the dust collectors (Portable-1 through Portable -6) controlling particulate from the prep sanding operations, CC Sanding 1 through CC

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Sanding 6, to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.5.9 Broken or Failed Bag Detection

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

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

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

#### D.5.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.5.1 and D.5.2.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of each coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC, including coating, dilution solvents, and cleaning solvents, input for each month.
- (b) To document the compliance status with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document the compliance status with Condition D.5.8, the Permittee shall maintain records of the dates and results of the inspections.
- (d) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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#### D.5.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.5.1 and D.5.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

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#### SECTION E.1 NESHAP

#### **Emissions Unit Description:**

- (d) Surface coating booths for wood cabinets:
  - (1) Three (3) surface coating booths for wood cabinets, constructed in 2013, identified as EU1-9, EU1-10 and EU1-11, each with a maximum capacity of 6.70 units per hour, using HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-9, SV1-10 and SV1-11, respectively. Each surface coating booth has an associated natural gas-fired process heater, identified as EUF1-9, EUF1-10, and EUF1-11, respectively, with a maximum capacity of 0.02 MMBtu/hour, each.
  - (2) One (1) surface coating booth for wood cabinets, constructed in 2014, identified as EU1-12, with a maximum capacity of 4.00 units per hour, using hand wipe and HVLP spray applicators and dry filters as particulate control and exhausting to stacks SV1-12. This surface coating booth has an associated natural gas-fired process heater, identified as EUF1-12, with a maximum capacity of 0.02 MMBtu/hour.

The four (4) surface coating booths are considered new affected sources under 40 CFR 63, Subpart JJ.

NOTE: These (4) four surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, are collectively bottlenecked due to the amount of wood cabinets produced at the source, with a maximum capacity to coat 6.70 units per hour.

(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 [326 IAC 2-7-5(1)]

- 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 63.1 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 emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.
  - (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 Wood Furniture Manufacturing Operations NESHAP [40 CFR Part 63, Subpart JJ][326 IAC 20-14]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-14, for the emission unit(s) listed above:

(1) 40 CFR 63.800(a)

(2) 40	<b>CFR</b>	63.800(	(b)	)
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- (3)40 CFR 63.800(d)
- (4)40 CFR 63.800(e)
- (5)40 CFR 63.800(h)
- (6)40 CFR 63.801
- (7)40 CFR 63.802(b)
- (8) 40 CFR 63.803
- (9)40 CFR 63.804(d)(1)
- (10)40 CFR 63.804(d)(2)
- (11)40 CFR 63.804(e)(1)
- (12)40 CFR 63.804(f)(1)
- (13)40 CFR 63.804(f)(2)
- (14)40 CFR 63.804(f)(3)
- (15)40 CFR 63.804(f)(5)
- (16)40 CFR 63.804(f)(7)
- (17)40 CFR 63.804(f)(8)
- (18)40 CFR 63.804(g)(1)
- (19)40 CFR 63.804(g)(2)
- (20)40 CFR 63.804(g)(3)
- 40 CFR 63.804(g)(5) (21)
- (22)40 CFR 63.804(g)(7)
- (23)40 CFR 63.804(g)(8)
- (24)40 CFR 63.804(g)(9)
- (25)40 CFR 63.804(h)
- (26)40 CFR 63.805(a)
- (27)40 CFR 63.806(a)
- (28)40 CFR 63.806(b)
- (29)40 CFR 63.806(c)
- (30)40 CFR 63.806(d) (31)40 CFR 63.806(e)
- (32)40 CFR 63.806(h)
- (33)40 CFR 63.806(i)
- (34)40 CFR 63.806(j)
- (35)40 CFR 63.806(k)
- (36)40 CFR 63.807(a)
- (37)40 CFR 63.807(b)
- (38)40 CFR 63.807(c)
- (39)40 CFR 63.807(e)
- (40)Table 1 to Subpart JJ of Part 63
- (41)Table 2 to Subpart JJ of Part 63
- (42)Table 3 to Subpart JJ of Part 63
- (43)Table 4 to Subpart JJ of Part 63
- (44)Table 5 to Subpart JJ of Part 63
- (45)Table 6 to Subpart JJ of Part 63

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#### SECTION E.2 NESHAP

#### **Emissions Unit Description:**

- (a) One (1) motor home painting operation utilizing HVLP or equivalent application methods, constructed in 1989, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with a maximum capacity of 1.25 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (f) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:
  - (1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.

Under 40 CFR 63, Subpart PPPP this is an affected unit.

(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 [326 IAC 2-7-5(1)]

- E.2.1 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 63.1 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 emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart PPPP.
  - (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.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission unit(s) listed above:

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481 (a)(1), (a)(5), (b), (c), (e)
- (3) 40 CFR 63.4482 (a), (b), (e)
- (4) 40 CFR 63.4483 (b), (d)
- (5) 40 CFR 63.4490 (b)(4)
- (6) 40 CFR 63.4491 (a), (b)
- (7) 40 CFR 63.4492 (a)
- (8) 40 CFR 63.4493 (a)

- (9) 40 CFR 63.4500 (a)(1), (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510 (a), (b), (c)
- (12) 40 CFR 63.4520 (a)
- (13) 40 CFR 63.4530 (a), (b), (c)(1-3), (d), (e), (f), (g), (h)
- (14) 40 CFR 63.4531
- (15) 40 CFR 63.4540
- (16) 40 CFR 63.4541
- (17) 40 CFR 63.4542
- (18) 40 CFR 63.4550
- (19) 40 CFR 63.4551
- (20) 40 CFR 63.4552
- (21) 40 CFR 63.4580
- (22) 40 CFR 63.4581
- (23) Table 2
- (24) Table 3

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#### SECTION E.3 NESHAP

#### **Emissions Unit Description:**

#### **Insignificant Activities:**

- (b) Activities associated with emergencies as follows:
  - (1) Emergency generators as follows:
    - (A) Natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower, as follows: [40 CFR 63, Subpart ZZZZ]
      - (i) One (1) natural gas fired emergency generator, constructed in 1988, with a maximum output capacity of 95 horsepower.
  - (2) Stationary fire pump engines, as follows. [40 CFR 63, Subpart ZZZZ]
    - (A) One (1) diesel fired emergency fire pump, constructed in 1988, with a maximum output capacity of 235 horsepower.

(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 [326 IAC 2-7-5(1)]

- E.3.1 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 63.1 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 emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.
  - (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.3.2 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(1)(ii)
- (4) 40 CFR 63.6595(a)(1)
- (5) 40 CFR 63.6602
- (6) 40 CFR 63.6605

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- (7) 40 CFR 63.6625(e)(2) (8) 40 CFR 63.6625(f)
- (9) 40 CFR 63.6625(h)
- (10) 40 CFR 63.6640(a)
- (11) 40 CFR 63.6640(b)
- (12) 40 CFR 63.6640(e)
- (13) 40 CFR 63.6640(f)
- (14) 40 CFR 63.6645(a)(5)
- (15) 40 CFR 63.6655(a)
- (16) 40 CFR 63.6655(d)
- (17) 40 CFR 63.6655(e)
- (18) 40 CFR 63.6655(f)
- (19) 40 CFR 63.6660
- (20) 40 CFR 63.6665
- (21) 40 CFR 63.6670
- (22) 40 CFR 63.6675
- (23) Table 2c to Subpart ZZZZ of Part 63, item 1 and item 6
- (24) Table 6 to Subpart ZZZZ of Part 63, item 9
- (25) Table 8 to Subpart ZZZZ of Part 63

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#### SECTION E.4 NESHAP

#### **Emissions Unit Description:**

(c) One (1) wood-fired boiler, identified as HY-400-200, constructed in 1993 and derated in 2016, with a maximum rated heat input capacity of 18.49 MMBtu/hr, and a derated heat input capacity of 9.9 MMBtu/hr, using a cyclone as control, and exhausting to stack 10A.

Under 40 CFR 63, Subpart DDDDD, this is an existing industrial boiler.

(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 [326 IAC 2-7-5(1)]

- E.4.1 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 63.1 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 emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.
  - (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.4.2 National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [40 CFR Part 63, Subpart DDDDD][326 IAC 20-95]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment E to the operating permit), which are incorporated by reference as 326 IAC 20-95, for the emission unit(s) listed above:

- (1) 40 CFR 63.7480
- (2) 40 CFR 63.7485
- (3) 40 CFR 63.7490(a)(1), (d)
- (4) 40 CFR 63.7495(b), (d)
- (5) 40 CFR 63.7499(d)
- (6) 40 CFR 63.7500(a)(1), (a)(3), (b), (f)
- (7) 40 CFR 63.7505(a)
- (8) 40 CFR 63.7510(e)
- (9) 40 CFR 63.7515(d)
- (10) 40 CFR 63.7530(e)
- (11) 40 CFR 63.7540(a)(11), (a)(13)
- (12) 40 CFR 63.7545(a), (b)
- (13) 40 CFR 63.7550(a), (b), (c)(1), (c)(5), (h)(3)
- (14) 40 CFR 63.7555(a)(1), (a)(2)
- (15) 40 CFR 63.7560
- (16) 40 CFR 63.7565

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- (17) 40 CFR 63.7570
- (18) 40 CFR 63.7575(19) Table 3 to 40 CFR 63, Subpart DDDDD
- (20) Table 9 to 40 CFR 63, Subpart DDDDD
- (21) Table 10 to 40 CFR 63, Subpart DDDDD

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rev Recreation Group, Inc.

Source Address: 1031 U.S. 224 E., Decatur, Indiana 46733

Part 70 Permit No.: T001-34744-00025

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
□ Annual Compliance Certification Letter
□ Test Result (specify)
□ Report (specify)
□ Notification (specify)
□ Affidavit (specify)
□ Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

Significant Permit Modification No. 001-37552-00025 Modified by: Kristen Willoughby DRAFT

Rev Recreation Group, Inc. Decatur, Indiana Permit Reviewer: Doug Logan Page 56 of 62 T001-34744-00025

# 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

### PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Rev Recreation Group, Inc.

Source Address: 1031 U.S. 224 E., Decatur, Indiana 46733

Part 70 Permit No.: T001-34744-00025

#### This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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If any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency started:	
Date/Time Emergency was corrected:	
Was the facility being properly operated at the time of the emergency?	Y N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities imminent injury to persons, severe damage to equipment, substantial loss of product or raw materials of substantial economic value:	
Form Completed by:	
Title / Position:	
Date:	
Phone:	

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# OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

#### **Part 70 Quarterly Report**

Source Name: Rev Recreation Group, Inc. Source Address: 1031 U.S. 224 E., Decatur, Indiana 46733 Part 70 Permit No.: T001-34744-00025 Facility: Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B VOC usage Limit: Less than 320 tons per twelve (12) month consecutive period with complianc determined at the end of each month.  QUARTER: YEAR:					
QUA	RTER:	YEAR:			
Month	Column 1	Column 2	Column 1 + Column 2		
Month	This Month	Previous 11 Months	12 Month Total		
□ De D Subr Title Sign	/ Position: ature:	is quarter. rted on:			
Date					

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

#### **Part 70 Quarterly Report**

Source Name: Source Address: Part 70 Permit No.: Facility: Parameter: Limit: Rev Recreation Group, Inc. 1031 U.S. 224 E., Decatur, Indiana 46733 T001-34744-00025 Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B Coating Solid Usage Less than 214 tons per twelve (12) month consecutive period with complianc determined at the end of each month.  QUARTER:  Rev Recreation Group, Inc. 1031 U.S. 224 E., Decatur, Indiana 46733 T001-34744-00025 Spray Booths 2A, 2B, 2C, 2D, 3B, 4A, 6A, 6B, 7A, and 7B Coating Solid Usage Less than 214 tons per twelve (12) month consecutive period with complianc determined at the end of each month.					
	Column 1	Column 2	Column 1 + Column 2		
Month	This Month	Previous 11 Months	12 Month Total		
□ De D Subr Title Sign	/ Position: ature: :	is quarter.			

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

#### **Part 70 Quarterly Report**

Source Name: Source Address: Part 70 Permit No.: Facility: Parameter: Limit 1: Limit 2:	T001-34744-00025 clear coat paint boot VOC input shall not exceed 39. compliance determine shall not exceed 24.	up, Inc. ecatur, Indiana 46733 ch, identified as PB#8 70 tons per twelve (12) consened at the end of each month 70 tons per twelve (12) consened at the end of each month	ecutive month period, with
QUA	RTER :	YEAR:	
Month	Column 1	Column 2	Column 1 + Column 2
Month	This Month	Previous 11 Months	12 Month Total
□ De D	o deviation occurred in t eviation/s occurred in thi eviation has been repor	is quarter.	
Title Signa	/ Position: ature: :		

Source Name:

#### Significant Permit Modification No. 001-37552-00025 Modified by: Kristen Willoughby DRAFT

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Rev Recreation Group, Inc.

Source Address: Part 70 Permit No		S. 224 E., Decatur, 744-00025	Indiana 46733	
	Months:	to	Year:	
Section B –Em General Report the probable ca required to be r shall be reported be included in t	ergency Provision ing. Any deviation ing. Any deviation in a control i	ons satisfies the report from the require attion, and the respont to an applicable the schedule stated tional pages may be	a calendar year. Proper notice porting requirements of paragements of this permit, the date can see steps taken must be reperted in the applicable requirement in the applicable requirement e attached if necessary. If no occurred this reporting period	raph (a) of Section C- e(s) of each deviation, orted. A deviation endent of the permit, it and does not need to deviations occurred,
□ NO DEVIAT	IONS OCCURRI	ED THIS REPORT	ING PERIOD.	
☐ THE FOLLO	WING DEVIATION	ONS OCCURRED	THIS REPORTING PERIOD	
Permit Require	ement (specify p	permit condition #)		
Date of Deviat	ion:		Duration of Deviation:	
Number of De	viations:			
Probable Caus	se of Deviation:			
Response Ste	ps Taken:			
Permit Require	ement (specify p	permit condition #)		
Date of Deviat	ion:		Duration of Deviation:	
Number of De	viations:			
Probable Caus	se of Deviation:			
Response Ste	ps Taken:			

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Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Form Completed by:	
Title / Position:	
Date:	
Phone:	

# Indiana Department of Environmental Management Office of Air Quality

#### Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

#### **Source Description and Location**

Source Name: Rev Recreation Group, Inc.

Source Location: 1031 U.S. 224 East, Decatur, IN 46733

County: Adams

SIC Code:
Operation Permit No.:
T 001-34744-00025
Operation Permit Issuance Date:
April 21, 2015
Significant Source Modification No.:
O01-37527-00025
Significant Permit Modification No.:
Vristen Willoughby

#### **Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. 001-34744-00025 on April 21, 2015. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	001-37238-00025	July 14, 2016

#### **County Attainment Status**

The source is located in Adams County.

Pollutant	Designation				
SO <sub>2</sub>	Better than national standards.				
CO	Unclassifiable or attainment effective November 15, 1990.				
$O_3$	Unclassifiable or attainment effective July 20, 2012 for the 2008 8-hour ozone standard. <sup>1</sup>				
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.				
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub>				
	standard.				
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.				
$NO_2$	Cannot be classified or better than national standards.				
Pb	Unclassifiable or attainment effective December 31, 2011.				
<sup>1</sup> Unclassifiable	<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was				
revoked effect	tive June 15, 2005.				

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides ( $NO_x$ ) 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  $NO_x$  emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and  $NO_x$  emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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(b)  $PM_{2.5}$ 

Adams County has been classified as attainment for PM25. Therefore, direct PM25, SO2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Other Criteria Pollutants (c)

> Adams County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) 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 or National Emission Standard for Hazardous Air Pollutants 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.

#### **Greenhouse Gas (GHG) Emissions**

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146 4q18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

#### **Source Status - Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

		Source-Wide Emissions Before Modification (ton/year)							
Process / Emission Unit	РМ	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	voc	СО	Single HAP*	Combined HAPs
Total for Source	<100	<100	<100	<100	<100	>250	<100	>10	>25
PSD Major Source Thresholds	250	250	250	250	250	250	250		

- This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD (a) regulated pollutant, VOC, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

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These emissions are based on the calculations included as Appendix A to the Technical Support (c) Document for Administrative Amendment No. 001-37238-00025.

#### **Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Rev Recreation Group, Inc. on August 18, 2016, relating to the addition of a clear coat operation and associated sanding. The following is a list of the proposed emission units and pollution control device(s):

- (a) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:
  - (1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.
    - Under 40 CFR 63, Subpart PPPP this is an affected unit.
  - One (1) natural gas fired air make-up unit heater for PB#8, with a maximum heat input of (2) 8.3 MMBtu/hr.
  - One (1) prep sanding operation consisting of six (6) hand sanders, collectively identified (3)as Sand and individually identified as CC Sanding 1 through CC Sanding 6, with a total bottleneck capacity of 1.25 units per hour, with emissions controlled by portable dust collectors (Portable-1 through Portable -6), and exhausting inside.

#### **Enforcement Issues**

There are no pending enforcement actions related to this modification.

#### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PB8-1	PB#8	40	5	37,500	73
PB8-2	PB#8	40	5	37,500	73

#### **Emission Calculations**

See Appendices A and B of this Technical Support Document for detailed emission calculations.

#### Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

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The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

	PTE Before Controls of the New Emission Units (ton/year)								
Process / Emission Unit	РМ	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>X</sub>	voc	со	Single HAP (Glycol Ether)	Combined HAPs
Clear Coat Paint Booth PB#8	27.10	27.10	27.10	-	-	55.5 9	-	10.78	12.43
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99		0.07
Prep Sanding	15.27	15.27	15.27	-	ı	-	ı	-	-
Total:	42.44	42.64	42.64	0.02	3.56	55.79	2.99	10.78	12.50

Appendix B of this TSD reflects the unrestricted potential emissions of the modification.

#### (a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM, PM10, direct PM2.5, and VOC at greater than or equal to twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit greater than or equal to ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

#### (b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions.

#### Permit Level Determination - PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and/or permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

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	Project Emissions (ton/year)							
Process / Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>X</sub>	VOC	СО	
Clear Coat Paint Booth PB#8	1.36	1.36	1.36	-	-	24.70	-	
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	
Prep Sanding	15.27	3.82	3.82	-	-	-	-	
Total for Modification	16.69	5.44	5.44	0.02	3.56	24.90	2.99	
Significant Levels	25	15	10	40	40	40	100	

<sup>\*</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

Note: There will be no upstream or downstream increased utilization due to the addition of this operation. This operation will apply a second clear coat to some of the high end vehicles produced.

(a) This modification to an existing major PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD significant level. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- The VOC input to PB#8 shall not exceed 39.70 tons per twelve (12) consecutive month (a) period, with compliance determined at the end of each month.
- The PM10 emissions from the prep sanding operations, CC Sanding 1 through CC (b) Sanding 6, shall each not exceed 0.15 lbs/hour.
- (c) The PM2.5 emissions from the prep sanding operations, CC Sanding 1 through CC Sanding 6, shall each not exceed 0.15 lbs/hour.

Compliance with these limits, shall limit the potential to emit from SSM No. 001-37527-00025 of PM<sub>10</sub> to less than fifteen (15) tons per twelve (12) consecutive month period, PM<sub>2.5</sub> to less than ten (10) tons per twelve (12) consecutive month period, and VOC to less than forty (40) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

#### **Federal Rule Applicability Determination**

Due to the modification at this source, federal rule applicability has been reviewed as follows:

#### **New Source Performance Standards (NSPS):**

#### 40 CFR 60, Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface **Coating Operations**

The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for the clear coat paint booth, because products coated at the source are not automobiles or light duty trucks as defined at 40 CFR 60.391.

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

#### 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for **Surface Coating of Miscellaneous Metal Parts and Products**

Pursuant to 40 CFR 63.3881(c)(16), the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63,

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(23)

(24)

Table 2

Table 3

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Subpart MMMM and 326 IAC 20-66 are not included in the permit for the clear coat paint booth, since this booth meets the applicability criteria for the assembled on-road vehicle subcategory in plastic parts and products surface coating.

#### 40 CFR 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

The clear coat paint booth is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-75. The unit subject to this rule include the following:

This emission unit is subject to the following portions of Subpart PPPP:

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(1)
       40 CFR 63.4480
(2)
       40 CFR 63.4481 (a)(1), (a)(5), (b), (c), (e)
       40 CFR 63.4482 (a), (b), (e)
(3)
       40 CFR 63.4483 (b), (d)
(4)
(5)
       40 CFR 63.4490 (b)(4)
(6)
       40 CFR 63.4491 (a), (b)
(7)
       40 CFR 63.4492 (a)
(8)
       40 CFR 63.4493 (a)
(9)
       40 CFR 63.4500 (a)(1), (b)
(10)
       40 CFR 63.4501
(11)
       40 CFR 63.4510 (b), (c)
(12)
       40 CFR 63.4520 (a)
(13)
       40 CFR 63.4530 (a), (b), (c)(1-3), (d), (e), (f), (g), (h)
(14)
       40 CFR 63.4531
(15)
       40 CFR 63.4540
(16)
       40 CFR 63.4541
       40 CFR 63.4542
(17)
(18)
       40 CFR 63.4550
(19)
       40 CFR 63.4551
(20)
       40 CFR 63.4552
(21)
       40 CFR 63.4580
(22)
       40 CFR 63.4581
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The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart PPPP.

#### 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for the air make-up unit heater for PB#8, since it is not a process heater as defined in 40 CFR 63.7575.

#### 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63, Subpart HHHHHH are not included in the permit for this source, since it is not an area source.

#### 40 CFR 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for this source, since it is not an area source.

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# **Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing (a) pollutant-specific emission unit that meets the following criteria:

- has a potential to emit before controls equal to or greater than the major source threshold (1) for the pollutant involved:
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3)uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO<sub>2</sub> and NO<sub>x</sub> under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit / Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
PB#8 - PM	DC	None	NA	NA	N <sup>2</sup>	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N <sup>1</sup>	N
CC Sanding 1 -PM10	DC	326 IAC 2-2	<100	<100	N 1	N
CC Sanding 1 - PM2.5	DC	326 IAC 2-2	<100	<100	N <sup>1</sup>	N

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy

BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Preciptator

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

CAM does not apply for PM10 or PM2.5 because the uncontrolled PTE of PM10 and PM2.5 is less than the major source threshold.

 $N^{2}$ The control device is not required to comply with the applicable emission limitation or standard. Therefore, based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable.

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Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification.

# **State Rule Applicability Determination**

Due to the modification at this source, state rule applicability has been reviewed as follows:

# 326 IAC 2-2 (PSD) and 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

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

The operation of PB#8 will emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to PB#8, however, pursuant to 326 IAC 2-4.1-1(b)(2), because this unit is specifically regulated by NESHAP 40 CFR 63, Subpart PPPP, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this unit is exempt from the requirements of 326 IAC 2-4.1.

# 326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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

The air make-up unit heater for PB#8 is direct fired. Therefore, the requirements of 326 IAC 6-2 are not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from PB#8 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-3-1(b)(13), the hand sanders (CC Sanding 1 through CC Sanding 6) are not subject to the requirements of 326 IAC 6-3, since each unit meets the definition of a trivial activity under 326 IAC 2-7-1.

The air make-up unit heater for PB#8 is not subject to the requirements of 326 IAC 6-3, since it is not a manufacturing process as defined in 326 IAC 6-3-1.5.

# 326 IAC 7-1.1 (Sulfur Dioxide Rules)

The air make-up unit heater for PB#8 has potential SO2 emissions less than 25 tons per year and 10 pounds per hour. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

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

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall comply with the following:

The VOC input to PB#8 shall not exceed 24.70 tons per twelve (12) consecutive month period. with compliance determined at the end of each month.

Compliance with this limit, in conjunction with the potential to emit from the air make-up heater for PB#8, shall limit the potential to emit from the clear coat operation of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

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

Pursuant to 326 IAC 8-2-2(a), 326 IAC 8-2-2 is not applicable to the source because the source does not coat passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers or any motor vehicle rated at three thousand eight hundred sixty-four (3.864) kilograms (eight thousand five hundred (8,500) pounds) gross weight or less that are designed primarily for the purpose of transportation or are derivatives of such vehicles.

# 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating)

Pursuant to 326 IAC 8-2-9(a)(1), 326 IAC 8-2-9 is not applicable to the source because the motor home painting operation is not located in Lake or Porter County and coats plastic parts and products.

# **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to assure 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 2-7-5. 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.

- The Compliance Determination Requirements applicable to this modification are as follows: (a)
  - The dust collectors for PM10 and PM2.5 control shall be in operation and control (1) emissions from the prep sanding operation, CC Sanding 1 through CC Sanding 6, at all times the prep sanding operation, CC Sanding 1 through CC Sanding 6, is in operation.
  - (2) The dry filters for particulate control shall be in operation and control emissions from the paint booth PB#8 at all times the paint booth PB#8 is in operation.
  - Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-(3)4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
  - (4) It has been determined that it is not necessary for the source to test CC Sanding 1 through CC Sanding 6. This is contingent upon the source operating and maintaining the dust collectors per Section D.5 of the permit. IDEM reserves the right to request testing.

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The Compliance Monitoring Requirements applicable to this proposed modification are as follows: (b)

Emission Unit/Control	Operating Parameters	Frequency
	Inspections	Once per day
PB#8 (Dry Filter)	Overspray Observations	Once per week
	Overspray Inspections	Once per month
CC Sanding 1 through CC Sanding 6 (Portable-1 through Portable-6)	Inspections	Once per quarter

These monitoring conditions are necessary because the dry filters for the PB#8 must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2(d) (Particulate Emissions Limitations for Manufacturing Processes), and 326 IAC 2-7 (Part 70).

These monitoring conditions are necessary because the dust collectors for the CC Sanding 1 through CC Sanding 6 must operate properly to assure compliance with 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

# **Proposed Changes**

The following changes listed below are due to the proposed modification. These changes may include Title I changes (ex changes that add or modify synthetic minor emission limits). Deleted language appears as strikethrough text and new language appears as **bold** text:

- (1) Condition A.2 was revised to include the new emission units.
- New Section D.5 was added to include the applicable rules and requirements for the new (2) emissions units. Associated reporting forms were added.
- (3)Section E.2 was revised to include the new booth PB#8.

# **Additional Changes**

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

Condition D.1.4, D.2.3, D.3.3, D.3.4, D.4.2, and D.4.3 were revised for clarification purposes. (1)

The permit has been revised as follows:

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

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

\*\*\*

- One (1) clear coat operation, approved in 2016 for construction, consisting of the (f) following:
  - One (1) clear coat paint booth, identified as PB#8, with a maximum capacity (1) of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.

Under 40 CFR 63, Subpart PPPP this is an affected unit.

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> (2) One (1) natural gas fired air make-up unit heater for PB#8, with a maximum heat input of 8.3 MMBtu/hr.

One (1) prep sanding operation consisting of six (6) hand sanders, (3) collectively identified as Sand and individually identified as CC Sanding 1 through CC Sanding 6, with a total bottleneck capacity of 1.25 units per hour, with emissions controlled by portable dust collectors (Portable-1 through Portable -6), and exhausting inside.

\*\*\*

# Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

\*\*\*

# Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

#### Preventive Maintenance Plan [326 IAC 2-7-5(12)] D.3.3

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

\*\*\*

#### D.3.4 Particulate Control

In order to ensure assure compliance with Condition D.3.2, the dry filters for particulate control shall be in operation and control emissions from the four (4) surface coating booths, identified as EU1-9, EU1-10, EU1-11, and EU1-12, at all times the units are in operation.

\*\*\*

# Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### Particulate Control D.4.3

In order to assure comply compliance with Condition D.4.1 and to ensure the (a) woodworking mill room is exempt from the requirements of 326 IAC 6-3-2, the baghouse (DV1-02) for particulate control shall be in operation and control emissions from the woodworking mill room facility at all times the woodworking mill room facility is in operation.

\*\*\*

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#### **SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS**

# **Emissions Unit Description:**

(f) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:

(1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.

Under 40 CFR 63, Subpart PPPP this is an affected unit.

- One (1) natural gas fired air make-up unit heater for PB#8, with a maximum heat (2) input of 8.3 MMBtu/hr.
- One (1) prep sanding operation consisting of six (6) hand sanders, collectively (3) identified as Sand and individually identified as CC Sanding 1 through CC Sanding 6, with a total bottleneck capacity of 1.25 units per hour, with emissions controlled by portable dust collectors (Portable-1 through Portable -6), and exhausting inside.

(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 2-7-5(1)]

#### D.5.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- The VOC input to PB#8 shall not exceed 39.70 tons per twelve (12) consecutive (a) month period, with compliance determined at the end of each month.
- The PM10 emissions from the prep sanding operations, CC Sanding 1 through CC (b) Sanding 6, shall each not exceed 0.15 lbs/hour.
- The PM2.5 emissions from the prep sanding operations, CC Sanding 1 through CC (c) Sanding 6, shall each not exceed 0.15 lbs/hour.

Compliance with these limits, in conjunction with the potential to emit from other units associated with this modification, shall limit the potential to emit from SSM No. 001-37527-00025 of PM to less than twenty-five (25) tons per twelve (12) consecutive month period, PM<sub>10</sub> to less than fifteen (15) tons per twelve (12) consecutive month period, PM<sub>2.5</sub> to less than ten (10) tons per twelve (12) consecutive month period, and VOC to less than forty (40) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

# **VOC Minor Limit** [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall comply with the following:

The VOC input to PB#8 shall not exceed 24.70 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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Compliance with this limit, in conjunction with the potential to emit from the air make-up heater for PB#8, shall limit the potential to emit from the clear coat operation of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

#### Particulate Emission Limitations [326 IAC 6-3-2(d)] D.5.3

Pursuant to 326 IAC 6-3-2(d), particulate from PB#8 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### Preventive Maintenance Plan [326 IAC 2-7-5(12)] D.5.4

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### D.5.5 **Particulate Control**

- In order to assure compliance with Condition D.5.1, the dust collectors for PM10 (a) and PM2.5 control shall be in operation and control emissions from the prep sanding operation, CC Sanding 1 through CC Sanding 6, at all times the prep sanding operation, CC Sanding 1 through CC Sanding 6, is in operation.
- In order to assure compliance with Condition D.5.3, the dry filters for particulate (b) control shall be in operation and control emissions from the paint booth PB#8 at all times the paint booth PB#8 is in operation.

# Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.5.7 Monitoring

- Daily inspections shall be performed to verify the placement, integrity and particle (a) loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth PB#8 stacks PB8-1 and PB8-2 while the booth is in operation. If a condition exists which should result in a response, 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- Monthly inspections shall be performed of the coating emissions from the stack (b) 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 a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

#### D.5.8 **Dust Collector Inspections**

The Permittee shall perform quarterly inspections of the dust collectors (Portable-1 through Portable -6) controlling particulate from the prep sanding operations, CC Sanding 1 through CC Sanding 6, to verify that they are being operated and maintained in

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accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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# D.5.9 Broken or Failed Bag Detection

(a) For a single compartment dust collectors controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

# D.5.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.5.1 and D.5.2.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of each coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total VOC, including coating, dilution solvents, and cleaning solvents, input for each month.
- (b) To document the compliance status with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document the compliance status with Condition D.5.8, the Permittee shall maintain records of the dates and results of the inspections.
- (d) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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# **D.5.11 Reporting Requirements**

A quarterly summary of the information to document the compliance status with Conditions D.5.1 and D.5.2 shall be submitted not later than thirty (30) days after the end of the guarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

**SECTION E.2 NESHAP** 

# Emissions Unit Description:

- (a) One (1) motor home painting operation utilizing HVLP or equivalent application methods, constructed in 1989, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with a maximum capacity of 1.25 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, and 7B respectively. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (f) One (1) clear coat operation, approved in 2016 for construction, consisting of the following:
  - (1) One (1) clear coat paint booth, identified as PB#8, with a maximum capacity of 1.25 units per hour and 3.51 gallons per unit, utilizing HVLP or equivalent application methods, with particulate emissions controlled by dry filters, and exhausting to stacks PB8-1 and PB8-2.

Under 40 CFR 63, Subpart PPPP this is an affected unit.

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission unit(s) listed above:

- 40 CFR 63.4480 (1)
- (2)40 CFR 63.4481(a)(1),
- (3)40 CFR 63.4481(a)(5)
- (4)40 CFR 63.4481(b), (c)
- <del>(5)</del> 40 CFR 63.4481(e)(1)
- (63)40 CFR 63.4482(a),
- (7)40 CFR 63.4482(b),
- (8) 40 CFR 63.4482(e)
- (94)40 CFR 63.4483(b).
- (10)40 CFR 63.4483(d)
- (115)40 CFR 63.4490(b)(4)
- (126)40 CFR 63.4491(a).
- (13)40 CFR 63.4491(b)
- (<del>14</del>7) 40 CFR 63.4492(a)
- (<del>15</del>8) 40 CFR 63.4493(a)
- (<del>16</del>9) 40 CFR 63.4500(a)(1),
- (17)40 CFR 63.4500(b)
- (1810) 40 CFR 63.4501
- (<del>19</del>11) 40 CFR 63.4510(a),
- (20) 40 CFR 63.4510(b).

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40 CFR 63.4510(c)(1) 40 CFR 63.4510(c)(2) 40 CFR 63.4510(c)(3) (23)(24)40 CFR 63.4510(c)(4) (25)40 CFR 63.4510(c)(5) (26)40 CFR 63.4510(c)(6) (27)40 CFR 63.4510(c)(7) (28)40 CFR 63.4510(c)(8)(i) (29)40 CFR 63.4510(c)(8)(ii) (3012) 40 CFR 63.4520(a)(1) (31)40 CFR 63.4520(a)(2) (32)40 CFR 63.4520(a)(3)(i) (33)40 CFR 63.4520(a)(3)(ii) 40 CFR 63.4520(a)(3)(iii) (34)<del>(35)</del> 40 CFR 63.4520(a)(3)(iv) (36)40 CFR 63.4520(a)(3)(v) (37)40 CFR 63.4520(a)(4) (38)40 CFR 63.4520(a)(5) (39)40 CFR 63.4520(a)(6) (4013) 40 CFR 63.4530(a), 40 CFR 63.4530(b), (42)40 CFR 63.4530(c)(1-3), (43)40 CFR 63.4530(c)(2) (44)40 CFR 63.4530(c)(3) (45)40 CFR 63.4530(d). (46)40 CFR 63.4530(e), (47)40 CFR 63.4530(f), 40 CFR 63.4530(g), <del>(48)</del> (49) 40 CFR 63.4530(h) (5014) 40 CFR 63.4531 (5115) 40 CFR 63.4540 (5216) 40 CFR 63.4541 (<del>53</del>17) 40 CFR 63.4542 (5418) 40 CFR 63.4550 (<del>55</del>19) 40 CFR 63.4551 (<del>56</del>**20**) 40 CFR 63.4552 (5721) 40 CFR 63.4580 (5822) 40 CFR 63.4581 (23)Table 2 (24)Table 3

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

# Part 70 Quarterly Report

Source Name: **Rev Recreation Group, Inc.** 

1031 U.S. 224 E., Decatur, Indiana 46733 **Source Address:** 

Part 70 Permit No.: T001-34744-00025

Facility: clear coat paint booth, identified as PB#8

Parameter: VOC input

Limit 1: shall not exceed 39.70 tons per twelve (12) consecutive month period, with

compliance determined at the end of each month.

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_imit 2:	shall not exceed 24.70 tons per twelve (12) consecutive month period, with
	compliance determined at the end of each month.

QUARTER:	YEAR:	

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

No deviation occurred in this quarter.	
<ul> <li>Deviation/s occurred in this quarter.</li> <li>Deviation has been reported on:</li> </ul>	
Submitted by:	_
Title / Position:	_
Signature:	_
Signature:	_

# **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 August 18, 2016.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-37527-00025. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

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# **IDEM Contact**

(a) Questions regarding this proposed permit can be directed to Kristen Willoughby 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) 233-3031 or toll free at 1-800-451-6027, extension 3-3031.

- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

# Appendix A: Emission Calculations PTE Summary

Company Name: Rev Recreation Group, Inc.
Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

		Uncontr	olled Potential to	Emit (tons/yr)				
Emission Unit	PM	PM10	PM2.5 <sup>1</sup>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, &7B	95.24	95.24	95.24			322.68		92.19
Booth 4A	11.94	11.94	11.94			45.38		6.13
Booth PB#8	27.10	27.10	27.10			55.59		12.43
Wood Coating (EU 1-8, 1-10, 1-11, 1-12)	2.82	2.82	2.82			13.92		4.78
Process heaters (EUF1-9,10,11, 12)	6.53E-04	2.61E-03	2.61E-03	2.06E-04	3.44E-02	1.89E-03	2.89E-02	6.48E-04
Boiler	17.34	16.35	14.74	1.08	21.25	0.56	26.02	1.45
Emergency Generator	1.71E-03	3.50E-03	3.50E-03	1.06E-04	0.40	5.34E-03	0.67	5.80E-03
Emergency Diesel Fire Pump	0.13	0.13	0.13	0.12	1.82	0.15	0.39	1.59E-03
Gasoline Dispensing						1.02		1.24E-02
Welding and Cutting	0.49	0.49	0.49					3.60E-02
Woodworking Mill Room (D1-02) 2	8.11	8.11	8.11					
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	0.07
Prep Sanding (CC Sanding 1 through CC Sanding 6)	15.27	15.27	15.27					
Total	178.51	177.72	176.12	1.23	27.07	439.50	30.10	117.11

Notes.

1. PM2.5 listed is direct PM2.5

2. PM/PM10/PM2.5 emissions from the woodworking mill room operations were calculated after consideration of the controls based on the integral to the process determination.

		Potentia	I to Emit after C	ontrol (tons/yr)				
Emission Unit	PM	PM10	PM2.5 <sup>1</sup>	SO <sub>2</sub>	NOx	VOC	co	Total HAPs
Booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, &7B	4.76	4.76	4.76			322.68		92.19
Booth 4A	0.60	0.60	0.60			45.38		6.13
Booth PB#8	1.36	1.36	1.36			55.59		12.43
Wood Coating (EU 1-8, 1-10, 1-11, 1-12)	0.14	0.14	0.14			13.92		4.78
Process heaters (EUF1-9,10,11, 12)	6.53E-04	2.61E-03	2.61E-03	2.06E-04	3.44E-02	1.89E-03	2.89E-02	6.48E-04
Boiler	17.34	16.35	14.74	1.08	21.25	0.56	26.02	1.45
Woodworking Mill Room (D1-02)	8.11	8.11	8.11					
Emergency Generator	1.71E-03	3.50E-03	3.50E-03	1.06E-04	0.40	5.34E-03	0.67	5.80E-03
Emergency Diesel Fire Pump	0.13	0.13	0.13	0.12	1.82	0.15	0.39	1.59E-03
Gasoline Dispensing						1.02		1.24E-02
Welding and Cutting	0.49	0.49	0.49					3.60E-02
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	6.73E-02
Prep Sanding (CC Sanding 1 through CC								
Sanding 6)	0.76	0.76	0.76					
Total	33.76	32.97	31.37	1.23	27.07	439.50	30.10	117.11

Notes:

1. PM2.5 listed is direct PM2.5

		Potentia	I to Emit after Iss	uance (tons/yr)				
Emission Unit	PM	PM10	PM2.5 <sup>2</sup>	SO <sub>2</sub>	NOx	VOC	со	Total HAPs
Booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, &7B	15.00	15.00	15.00			320.00		92.19
Booth 4A								6.13
Booth PB#8	1.36	1.36	1.36			24.70		12.43
Wood Coating (EU 1-8, 1-10, 1-11, 1-12) <sup>3</sup>	1.84	1.84	1.84			13.92		4.78
Process heaters (EUF1-9,10,11, 12)	6.53E-04	2.61E-03	2.61E-03	2.06E-04	3.44E-02	1.89E-03	2.89E-02	6.48E-04
Boiler	17.34	16.35	14.74	1.08	21.25	0.56	26.02	1.45
Emergency Generator	1.71E-03	3.50E-03	3.50E-03	1.06E-04	0.40	5.34E-03	0.67	5.80E-03
Emergency Diesel Fire Pump	0.13	0.13	0.13	0.12	1.82	0.15	0.39	1.59E-03
Gasoline Dispensing						1.02		1.24E-02
Welding and Cutting	0.49	0.49	0.49					3.60E-02
Woodworking Mill Room (D1-02)	8.76	8.76	8.76					
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	0.07
Prep Sanding (CC Sanding 1 through CC								
Sanding 6)	15.27	3.82	3.82	-				
Total	60.25	48.01	46.41	1.23	27.07	360.55	30.10	117.11

Notes:

- The shaded cells indicate where limits are included.
- 2. PM2.5 listed is direct PM2.5
- 3. Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95%, shall adequately to limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

# Appendix A: Emissions Calculations Hazardous Air Pollutant Summary

Company Name: Rev Recreation Group, Inc.
Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733
Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: Reviewer: Kristen Willoughby

				Und	controlled Poter	ntial to Emit (to	ons/yr)					
Emission Unit	Booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, &7B	Booth 4A	Booth PB#8	Wood Coating	Process Heaters	Boiler	Emergency Generator	Emergency Fire Pump	Gasoline Tanks	Welding and Cutting	Air Make-Up Heater for PB#8	Total HAP
Organic HAPs												
Acetaldehyde					-		5.04E-04	3.15E-04				8.19E-04
Acrolein					-	0.17	4.75E-04	3.80E-05				0.17
Benzene					7.21E-07	0.18	2.85E-04	3.84E-04	3.76E-03		7.48E-05	0.19
1,3-Butadiene							1.20E-04	1.61E-05				1.36E-04
Cumene				0.73								0.73
Dichlorobenzene		-			4.12E-07						4.28E-05	4.12E-07
Ethylbenzene	8.11		0.05	0.11								8.26
Formaldehyde				5.32E-02	2.58E-05	0.19	3.70E-03	4.85E-04			2.67E-03	0.25
Glycol Ether			10.78									10.78
1,6-HMDI	negl		0.05									0.05
n-Hexane					6.18E-04				3.46E-03		6.42E-02	4.07E-03
Methanol	1.74	-					5.52E-04					1.74
MIBK	7.81		1.37									9.18
Naphthalene				0.56								0.56
Styrene				2.89		0.08						2.97
Toluene	40.57	6.13		8.87E-02	1.17E-06		1.01E-04	1.68E-04	4.07E-03		1.21E-04	46.79
Total PAH							2.55E-05	6.91E-05				9.45E-05
Xylenes	36.27	-	0.19	0.69			3.52E-05	1.17E-04	1.12E-03			37.15
Inorganic HAPs	•	•				•	•			•		
Cadmium					3.78E-07						3.92E-05	3.78E-07
Chromium					4.81E-07				-	1.86E-04	4.99E-05	4.81E-07
Hydrogen chloride						0.82			-			0.82
Lead					1.72E-07				-		1.78E-05	1.72E-07
Manganese					1.31E-07					3.57E-02	1.35E-05	1.31E-07
Nickel					7.21E-07					6.21E-05	7.48E-05	7.21E-07
Total Emissions	92.19	6.13	12.43	4.78	6.48E-04	1.45	5.80E-03	1.59E-03	1.24E-02	3.60E-02	6.73E-02	117.01

				Pote	ential to Emit af	ter Issuance (1	tons/yr)					
Emission Unit	Booths 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A, &7B	Booth 4A	Booth PB#8	Wood Coating	Process Heaters	Boiler	Emergency Generator	Emergency Fire Pump	Gasoline Tanks	Welding and Cutting	Air Make-Up Heater for PB#8	Total HAP
Organic HAPs												
Acetaldehyde						-	5.04E-04	3.15E-04	-			8.19E-04
Acrolein						0.17	4.75E-04	3.80E-05	-			0.17
Benzene					7.21E-07	0.18	2.85E-04	3.84E-04	3.76E-03		7.48E-05	0.19
1,3-Butadiene						-	1.20E-04	1.61E-05				1.36E-04
Cumene				0.73								0.73
Dichlorobenzene					4.12E-07	-		-	-		4.28E-05	4.12E-07
Ethylbenzene	8.11		0.05	0.11		-		-	-			8.26
Formaldehyde				5.32E-02	2.58E-05	0.19	3.70E-03	4.85E-04	-		2.67E-03	0.25
1,6-HMDI	negl	-	10.78									10.78
n-Hexane			0.05		6.18E-04				3.46E-03			5.23E-02
Methanol	1.74						5.52E-04				6.42E-02	1.74E+00
MIBK	7.81											7.81
Naphthalene			1.37	0.56		-		-	-			1.92
Styrene				2.89		0.08		-	-			2.97
Toluene	40.57	6.13		8.87E-02	1.17E-06	-	1.01E-04	1.68E-04	4.07E-03			46.79
Total PAH							2.55E-05	6.91E-05			1.21E-04	9.45E-05
Xylenes	36.27			0.69			3.52E-05	1.17E-04	1.12E-03			36.96
Inorganic HAPs						0.00						
Cadmium					3.78E-07						3.92E-05	3.78E-07
Chromium					4.81E-07				-	1.86E-04	4.99E-05	4.81E-07
Hydrogen chloride						0.82			-			0.82
Lead					1.72E-07				-		1.78E-05	1.72E-07
Manganese					1.31E-07				-	3.57E-02	1.35E-05	1.31E-07
Nickel					7.21E-07					6.21E-05	7.48E-05	7.21E-07
Total Emissions	92.19	6.13	12.24	4.78	6.48E-04	1.45	5.80E-03	1.59E-03	1.24E-02	3.60E-02	6.73E-02	116.81

# Appendix A: Emissions Calculations External Combustion Boiler Wood Waste Combustion (uncontrolled) Dry Wood

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

Capacity (MMBtu/hr)

9.9

		Pollutant									
	PM <sup>1</sup>	PM10 <sup>1</sup>	PM2.5 <sup>1</sup>	SO2	NOx	voc	СО				
Emission Factor in lb/MMBtu (AP-42, uncontrolled)	0.4	0.377	0.327	0.025	0.49	0.013	0.6				
Emission Factor in lb/MMBtu (May 24, 2012 stack test) <sup>2</sup>	0.313	0.34	0.34		0.225	0.002	0.202				
Potential to Emit in tons/yr <sup>3</sup>	17.34	16.35	14.74	1.08	21.25	0.56	26.02				

 $Wet wood is considered to be greater than or equal to 20\% \ moisture \ content. \ Dry \ wood is \ considered to be less than 20\% \ moisture \ content.$ 

This unit burns only dry wood, ref. TSD App A, T001-17529-00025)

- 1. The PM10 and PM2.5 emission factors include the condensable PM emission factor measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent). PM2.5 Emission Factor is worst case and the source has proposed this value for the boiler derate.
- 2. Particulate emissions determined after a dropout box.
- 3. Potential to emit determined using worst-case emission factors shown in **bold** type

### Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for

industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers,

03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

		Select	ed Hazardous Air Pol	lutants	
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	0.17	0.18	0.19	0.82	0.08

# Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10<sup>6</sup> Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for

industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers,

03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

#### Appendix A: Emissions Calculations VOC and Particulate From Surface Coating Operations

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

Unit ID	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempts 1	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water & exempts 2	Pounds VOC per gallon of coating <sup>2</sup>	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Particulate Control Efficiency	Controlled Particulate Emissions	lb VOC/gal solids	Transfer Efficiency
	Clearcoat 8430s	7.98	50.11%	5.0%	45.1%	0.0%	42.42%	3.51	1.250	3.70	3.60	15.78	378.70	69.11	26.75	95%	1.34	8.49	65%
	Activator 15305s	8.66	34.00%	16.0%	18.0%	0.0%	59.22%	1.75	1.250	1.90	1.60	3.51	84.16	15.36	19.20	95%	0.96	2.63	65%
	Activator 15307s	8.73	34.00%	16.0%	18.0%	0.0%	59.71%	1.75	1.250	1.90	1.60	3.51	84.16	15.36	19.36	95%	0.97	2.63	65%
	Basecoat 7175s	6.65	99.83%	5.0%	94.8%	0.0%	0.13%	3.58	1.250	6.60	6.00	26.81	643.50	117.44	7.74E-02	95%	3.87E-03	4850.92	65%
	Basecoat 7185s	6.67	99.83%	0.0%	99.8%	0.0%	0.13%	3.58	1.250	6.70	6.70	29.94	718.58	131.14	7.77E-02	95%	3.88E-03	5122.05	65%
Booths 2A, 2B, 2C, 2D,	Basecoat 7195s	6.66	99.83%	0.0%	99.8%	0.0%	0.13%	3.58	1.250	6.60	6.60	29.49	707.85	129.18	7.76E-02	95%	3.88E-03	5114.37	65%
3B, 6A, 6B, 7A, & 7B	Color 745478k	7.62	76.50%	5.0%	71.5%	0.0%	18.21%	3.58	1.250	5.70	4.80	21.45	514.80	93.95	12.27	95%	0.61	29.92	65%
	Color 751051k	8.05	71.35%	5.0%	66.4%	0.0%	19.17%	3.58	1.250	5.60	4.70	21.00	504.08	91.99	15.80	95%	0.79	27.86	65%
	Color 776866k	7.64	76.84%	5.0%	71.8%	0.0%	17.47%	3.58	1.250	5.70	4.80	21.45	514.80	93.95	12.12	95%	0.61	31.42	65%
	Color 745479k	7.77	74.75%	5.0%	69.8%	0.0%	18.31%	3.58	1.250	5.70	4.80	21.45	514.80	93.95	13.44	95%	0.67	29.60	65%
	Color 526004k	7.66	76.76%	5.0%	71.8%	0.0%	17.64%	3.58	1.250	5.80	4.90	21.90	525.53	95.91	12.20	95%	0.61	31.16	65%
	Color 745474k	10.26	30.21%	0.0%	30.2%	0.0%	57.54%	3.58	1.250	3.10	3.10	13.85	332.48	60.68	49.05	95%	2.45	5.39	65%
	Color 751052k	8.56	65.90%	5.0%	60.9%	0.0%	20.87%	3.58	1.250	5.50	4.60	20.56	493.35	90.04	20.00	95%	1.00	24.98	65%
	106 gun cleaner	6.78	100.00%	27.0%	73.0%	0.0%	0.00%	0.23	1.250	6.90	4.40	1.29	30.96	5.65	0	95%	0	0.00	65%
	3602s purge	6.65	100.00%	16.0%	84.0%	0.0%	0.00%	0.19	1.250	6.60	5.40	1.26	30.21	5.51	0	95%	0	0.00	65%
Total for Booths 2A, 2B, 2	C, 2D, 3B, 6A, 6B, 7A,	&7B												322.68	95.24		4.76		
Booth 4A <sup>3</sup>	3M 92 adhesive	7.09	70.30%	15.0%	55.3%	0.0%	30.00%	0.16	23.125	3.57	2.80	10.36	248.64	45.38	11.94	95%	0.60	13.07	65%
Total for Booth 4A														45.38	11.94		0.60		
Clear Coat Spray Booth #8	RV Clear As-Applied with Activator	8.37	51.86%	17.3%	34.6%	16.2%	43.94%	3.51	1.250	3.45	2.89	12.69	304.60	55.59	27.10	95%	1.36	6.58	65%
Total for Booth PB#8	•			_		•			•	•	•	•	•	55.59	27.10		1.36		

#### Notes

1. Minimum value from MSDS

2. Values from MSDS except as noted

3. Pounds of VOC per gallon of coating from July 2009 TDS (336 g/l)

#### Methodology

Worst-case choices of colors and seasonal activators and basecoats shown in **bold** are included in column totals

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

#### Appendix A: Emission Calculations HAP Emission Calculations

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

Unit ID	Material	Density (lb/gal)		Maximum (unit/hour)	Weight % 1,6-HMDI <sup>1</sup>	Weight % Xylene	Weight %	Weight % MIBK <sup>3</sup>	Weight % Methanol	Weight %	Weight %	Weight % Ethylbenzene	1,6-HMDI Emissions <sup>4</sup> (tons/yr)	Xylene Emissions (tons/yr)	EB Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Toluene Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Total HAP Emissions (tons/yr)
	Clearcoat 8430s	7.98	3.507	1.250	0%	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0.00
	Activator 15305s	8.66	1.753	1.250	0.10%	0%	0%	0%	0%	0%	0%	0%	negl	0	0	0	0	0	0	0	negl
	Activator 15307s	8.73	1.753	1.250	0.10%	0%	0%	0%	0%	0%	0%	0%	negl	0	0	0	0	0	0	0	negl
	Basecoat 7175s	6.65	3.575	1.250	0%	7.00%	1.50%	6.00%	0%	3.00%	0%	0%	0	9.11	1.95	7.81	0	3.90	0	0	22.78
	Basecoat 7185s	6.67	3.575	1.250	0%	0.20%	0%	0%	0%	0%	0%	0%	0	0.26	0	0	0	0	0	0	0.26
	Basecoat 7195s	6.66	3.575	1.250	0%	2.00%	0.60%	0%	0%	0%	0%	0%	0	2.61	0.78	0	0	0	0	0	3.39
Booths 2A, 2B, 2C, 2D,	Color 745478k	7.62	3.575	1.250	0%	18.00%	4.00%	0%	0%	21.00%	0%	0%	0	26.85	5.97	0	0	31.32	0	0	64.13
3B, 6A, 6B, 7A, & 7B	Color 751051k	8.05	3.575	1.250	0%	12.00%	3.10%	0%	0%	21.00%	0%	0%	0	18.91	4.88	0	0	33.09	0	0	56.88
	Color 776866k	7.64	3.575	1.250	0%	15.00%	4.20%	0%	0%	22.00%	0%	0%	0	22.43	6.28	0	0	32.90	0	0	61.61
	Color 745479k <sup>5</sup>	7.77	3.575	1.250	0%	17.04%	4.00%	0%	0%	21.00%	0%	0%	0	25.91	6.08	0	0	31.94	0	0	63.94
	Color 526004k	7.66	3.575	1.250	0%	15.00%	3.80%	0%	0%	22.00%	0%	0%	0	22.49	5.70	0	0	32.98	0	0	61.17
	Color 745474k	10.26	3.575	1.250	0%	0.20%	0%	0%	0%	0%	0%	0%	0	0.40	0.00	0	0	0	0	0	0.40
	Color 751052k <sup>6</sup>	8.56	3.575	1.250	0%	14.00%	3.10%	0%	0%	20.00%	0%	0%	0	23.46	5.19	0	0	33.51	0	0	62.16
	106 gun cleaner	6.78	0.235	1.250	0%	3.00%	0.80%	0%	20.00%	30.00%	0%	0%	0	0.26	0.07	0	1.74	2.61	0	0	4.68
	3602s purge <sup>6</sup>	6.65	0.186	1.250	0%	0.75%	0%	0%	0%	8.00%	0%	0%	0	0.05	0	0	0	0.54	0	0	0.59
Coating Booth Total <sup>7</sup>													negl	36.27	8.11	7.81	1.74	40.57	0	0	92.19
Booth 4A	adhesive	7.51	26.630	1.000	0%	0%	0%	0%	0%	0.70%	0%	0%	0	0	0	0	0	6.13	0	0	6.13
Booth 4A Total													0	0	0	0	0	6.13	0	0	6.13
Clear Coat Spray Booth #8	RV Clear As-Applied with Activator	8.37	3.510	1.250	0.03%	0.12%	0%	0.85%	0%	0%	6.70%	0.03%	0.05	0.19	0	1.37	0	0	10.78	0.05	12.43
Total for Booth PB#8													0.05	0.19	0	1.37	0	0	10.78	0.05	12.43

#### Notes:

- 1. 1,6-Hexamethylene diisocyanate
- 2. Ethylbenzene
- 3. Methyl isobutyl ketone (4-methyl-2-propanone)
- 4. 1,6-HMDI emissions are negligible because the compound is in the coating solids, not the solvent phase, and reacts in curing the coating.
- 5. HAP content for 745479k includes default concentration of xylenes in Stoddard Solvent, CASRN 8052-41-3 from Table 3, 40 CFR 63, Subpart MMMM
- 6. HAP content for 745474K and 3602S based on max. concentration of aromatic hydrocarbons, CASRN 64742-95-6, and worst case HAP content for this CASRN from Table 3, 40 CFR 63, Subpart MMMM
- 7. Total includes worst-case of the three seasonal basecoats, worst-case color additive, and all cleaning solvents. Values included in column totals are in **bold** type.

#### Methodology

HAPS Emissions (tons/yr) = Density (lb/gal) x Gal of Material (gal/unit) x Maximum (unit/hr) x (Weight % HAP/100) x 8,760 (hrs/yr) / 2,000 (lb/ton)

# Appendix A: Emissions Calculations VOC and Particulate

From Wood Cabinet Surface Coating Operations

Company Name: Rev Recreation Group, Inc.
Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

Material	Material ID	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	Uncontrolled PTE PM/PM10/PM2 .5 (ton/yr)	Controlled PTE PM/PM10/PM2 .5 (lb/hr)	Controlled PTE PM/PM10/PM2 .5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Notes Below)	Control Efficiency (%)	Application Method	Substrate
HVLP Spray (EU 1-9, EU 1-10, EU 1-11)																						
Compliant Water White Conv., Gloss	V84VXC5957-4383	7.58	66.09%	10.68%	55.41%	8.00%	25.00%	0.08	6.700	4.57	4.20	2.19	52.68	9.61	1.47	0.02	0.07	20.04	75%	95%	HVLP	Wood
Butyl Acetate	R6K18	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.0020	6.700	7.31	7.31	0.10	2.35	0.43	0.00	0.00	0.00	N/A	75%	95%	HVLP	Wood
Compliant Water White Conv., 40 Gloss	V84VXT10795-4383	7.60	65.79%	10.66%	55.13%	9.50%	25.00%	0.08	6.700	4.63	4.19	2.19	52.55	9.59	1.49	0.02	0.07	20.00	75%	95%	HVLP	Wood
Polyurethane Self-Sealer Matt	SC4185/00 MIXED2	8.32	61.40%	0.00%	61.40%	0.00%	31.70%	0.08	6.700	5.11	5.11	2.67	64.07	11.69	1.84	0.02	0.09	16.12	75%	95%	HVLP	Wood
Mineral Spirits	R1K4	6.42	100.00%	0.00%	100.00%	0.00%	0.00%	0.0020	6.700	6.42	6.42	0.09	2.06	0.38	0.00	0.00	0.00	N/A	75%	95%	HVLP	Wood
									*Worst	Case for each in	ndividual booth	2.67	64.07	11.69	1.84	0.02	0.09					

Stain Application (EU 1-12)																						
Stain, Newport Cherry	S64XXN6652-4383	7.89	84.40%	0.80%	83.60%	0.70%	9.10%	0.08	4.000	6.64	6.60	2.06	49.39	9.01	0.42	0.00	0.02	73.18	75%	95%	HVLP	Wood
Stain, Fulton Cherry	S64XXN12007-4383	7.63	84.40%	0.70%	83.70%	0.70%	11.00%	0.08	4.000	6.43	6.39	1.99	47.82	8.73	0.41	0.00	0.02	58.54	75%	95%	HVLP	Wood
Stain, Italian Sienna II	S64XXN12691-4383	7.82	75.45%	0.13%	75.32%	0.10%	17.00%	0.08	4.000	5.90	5.89	1.84	44.10	8.05	0.66	0.01	0.03	34.71	75%	95%	HVLP	Wood
Stain, Dark Cherry Wipe	S46XXN1496-1431	7.14	87.82%	7.15%	80.67%	6.50%	9.00%	0.08	4.000	6.16	5.76	1.80	43.13	7.87	0.30	0.00	0.01	69.67	75%	95%	HVLP	Wood
Stain, Midnight Sienna	S64XXN1502-1431	7.58	81.93%	0.93%	81.00%	0.80%	13.00%	0.08	4.000	6.19	6.14	1.92	45.97	8.39	0.47	0.01	0.02	47.77	75%	95%	HVLP	Wood
Stain, Espressso Monaco	S64XXN1362-1431	7.67	79.01%	0.79%	78.22%	0.70%	15.00%	0.08	4.000	6.04	6.00	1.87	44.92	8.20	0.55	0.01	0.03	40.40	75%	95%	HVLP	Wood
Stain, Alder Spice	S64XXE10735-4383	7.87	86.15%	0.51%	85.64%	5.00%	8.00%	0.08	4.000	7.09	6.74	2.10	50.47	9.21	0.37	0.00	0.02	84.75	75%	95%	HVLP	Wood
Stain, Dark Cherry New	S64XXN1672-1431	7.06	89.09%	14.87%	74.22%	12.00%	7.00%	0.08	4.000	5.95	5.24	1.63	39.24	7.16	0.26	0.00	0.01	89.85	75%	95%	HVLP	Wood
Stain, Espresso New	S64XXN1673-1431	6.92	91.04%	22.98%	68.06%	15.00%	6.00%	0.08	4.000	5.54	4.71	1.47	35.27	6.44	0.21	0.00	0.01	105.00	75%	95%	HVLP	Wood
Stain, Wheat	S54XXN1598-1431	7.58	85.75%	0.00%	85.75%	0.00%	10.00%	0.08	4.000	6.50	6.50	2.03	48.67	8.88	0.37	0.00	0.02	65.00	75%	95%	HVLP	Wood
Glaze, Brown Pen Glaze	S66XXN1499-1431	7.08	90.11%	44.06%	46.05%	3.80%	6.00%	0.08	4.000	3.39	3.26	1.02	24.41	4.46	0.24	0.00	0.01	106.33	75%	95%	HVLP	Wood
Glaze, Van Dyke Brown Wet	S66XXN1486-1431	7.11	85.79%	0.00%	85.79%	0.00%	10.00%	0.08	4.000	6.10	6.10	1.90	45.67	8.34	0.35	0.00	0.02	61.00	75%	95%	HVLP	Wood
Glaze, Van Dyke Brown	S66N11	7.72	62.82%	0.00%	62.82%	0.00%	26.00%	0.08	4.000	4.85	4.85	1.51	36.31	6.63	0.98	0.01	0.05	18.65	75%	95%	HVLP	Wood
										*Worst	Case for Stains	2.10	50.47	9.21	0.98	0.01	0.05					
													Total PTF F	M/PM10/PM2 5	2 82	3 22F <sub>*</sub> 02	0.14	1				

NOTES

"EU-9, EU-10, EU-11, and EU-12 are collectively bottlenecked to a maximum of 6.7 units per hour, with the individual booth EU-12 for applying stain having a maximum of less than 4 units/hr.
Worst Case calculation is representative of 6.7 units per hour for paint application in EU-12.

Bottlenecked Worst Case for EU-9, EU-10, EU11, and EU-12	Maximum (unit/hour)	PTE VOC (lb/hr)	PTE VOC (lb/hr/unit)	Bottlenecked Units per Hour	PTE VOC (lb/hr)	PTE VOC (tons/year)
EU-9, EU-10. EU-11	6.70	2.67	0.40	2.70	1.08	4.71
EU-12	4.00	2.10	0.53	4.00	2.10	9.21
					Total	13.92

This table represents the worst case of the 6.7 units per hour bottleneck for all four booths. The 4.0 units coated in emission unit EU-12, and 2.7 units being coated in any combination of emission units EU-9, EU-10, and EU-11.

#### Appendix A: Emission Calculations **HAP Emission Calculations** From Wood Cabinet Surface Coating Operations

Company Name: Rev Recreation Group, Inc. Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

Material	Material ID	Density		Maximum				Weight %	Weight %	. 3	Weight %				EB Emissions	Naphthalene Emissions	Styrene Emissions	Formaldehyde Emissions	Emissions	
		(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Cumene	EB	Naphthalene	Styrene	Formaldehyde	Toluene	Total HAPs	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
HVLP Spray																				
Compliant Water White Conv., Gloss	V84VXC5957-4383	7.58	0.078	6.700	0.21%					0.10%	0.21%	0.52%	3.64E-02	0	0	0	0	1.74E-02	3.64E-02	9.02E-02
Hi-Bild PreCat Lacquer	T77F57	7.88	0.080	6.700						0.10%		0.10%	0	0	0	0	0	1.85E-02	0	1.85E-02
Clear Polyester Finish	PU0317/00 MIXED2	8.88	0.080	6.700					8.00%			8.00%	0	0	0	0	1.67	0	0	1.67
Clear Polyester Basecoat	PU0386/00 MIXED2	8.67	0.080	6.700					6.00%			6.00%	0	0	0	0	1.22	0	0	1.22
Compliant Water White Conv., 40 Gloss	V84VXT10795-4383	7.60	0.078	6.700	0.21%					0.10%	0.21%	0.52%	3.65E-02	0	0	0	0	1.74E-02	3.65E-02	9.05E-02
Polyurethane Self-Sealer Matt	SC4185/00 MIXED2	8.32	0.078	6.700	1.00%		0.10%					1.10%	0.19	0	1.90E-02	0	0	0	0	0.21
Mineral spirits	R1K4	6.42	0.002	6.700	1.00%							1.00%	3.77E-03	0	0	0	0	0	0	3.77E-03
										Total of a	all coatings	and solvents	0.27	0	1.90F-02	0	2.89	5.32F-02	7.30F-02	3.30

Hand	vvipe
Stain.	Newp

nano wipe																				
Stain, Newport Cherry	S64XXN6652-4383	7.89	0.078	6.700	2.14%	1.06%	0.50%					3.70%	0.39	0.19	9.03E-02	0	0	0	0	0.67
Stain, Fulton Cherry	S64XXN12007-4383	7.63	0.078	6.700	2.30%	3.14%	0.20%				0.09%	5.73%	0.40	0.55	3.49E-02	0	0	0	1.57E-02	1.00
Stain, Italian Sienna II	S64XXN12691-4383	7.82	0.078	6.700	2.29%	2.12%					0.06%	4.47%	0.41	0.38	0	0	0	0	1.07E-02	0.80
Stain, Dark Cherry Wipe	S46XXN1496-1431	7.14	0.078	6.700	2.31%		0.40%	3.40%				6.11%	0.38	0	6.54E-02	0.56	0	0	0	1.00
Stain, Midnight Sienna	S64XXN1502-1431	7.58	0.078	6.700	2.32%	1.22%	0.30%					3.84%	0.40	0.21	5.21E-02	0	0	0	0	0.67
Stain, Espressso Monaco	S64XXN1362-1431	7.67	0.078	6.700	2.32%	1.20%	0.30%					3.82%	0.41	0.21	5.27E-02	0	0	0	0	0.67
Stain, Alder Spice	S64XXE10735-4383	7.87	0.078	6.700	2.15%	2.06%	0.10%					4.31%	0.39	0.37	1.80E-02	0	0	0	0	0.78
Stain, Dark Cherry New	S64XXN1672-1431	7.06	0.078	6.700	2.21%		0.30%	1.90%				4.41%	0.36	0	4.85E-02	0.31	0	0	0	0.71
Stain, Espresso New	S64XXN1673-1431	6.92	0.078	6.700	0.11%		0.20%	1.20%				1.51%	1.74E-02	0	3.17E-02	0.19	0	0	0	0.24
Stain, Wheat	S54XXN1598-1431	7.58	0.078	6.700	2.41%	4.20%		1.90%				8.51%	0.42	0.73	0	0.33	0	0	0	1.48
Glaze, Van Dyke Brown Wet	S66XXN1486-1431	7.11	0.078	6.700	0.53%			1.70%				2.23%	8.63E-02	0	0	0.28	0	0	0	0.36
Glaze, Van Dyke Brown	S66N11	7.72	0.078	6.700	0.56%							0.56%	0.10	0	0	0	0	0	0	0.10
									Worst	case hand wipe	process HA	P emissions	0.42	0.73	9.03E-02	0.56	0	0	1.57E-02	1.48

Total Potential Emissions

Total Spray plus worst case wipe 0.69

0.73

0.11 0.56 2.89 0.05

0.09 4.78

#### METHODOLOGY

Weight percents include fraction of named solvent in blends (e.g., mineral spirits) from Table 3 to Subpart MMMM of Part 63 Based on data from TSD App A, SPM T001-33453-00025

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

### Process Particulate Emissions Woodworking Mill Room (D1-02)

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

						Potential E	missions (tons/ye	ar)				
DUST COLLEC	CTOR								Uncontrolled		Controlled	
Process	Collector ID	Stack ID	Throughput	Airflow	Grain Loading per	Air to Cloth Ratio Air	Total Filter Area	Capture and	PM=PM10=PM2.5	PM=PM10=PM2.5	PM=PM10=PM2.5	PM=PM10=PM2.5
			lbs wood/hr	(acfm)	Actual Cubic Foot	Flow (acfm/ft²)	(ft²)	Control Efficiency	Emissions	Emissions	Emissions	Emissions
					of Outlet Air				(tons/yr)	(lb/hr)	(lb/day)	(tons/yr)
D1-02	DV1-02	N/A - Venting Indoors	2,240	7200	0.03	4	2280	97.02%	272.12	1.85	44.43	8.11
Total Emissions	s:				•				272.12	1.85		8.11

#### Methodology:

Dust collectors are considered integral to the woodworking process consistent with the determination made in T039-26937-00017.

#### Controlled Emission:

Controlled Emission (lb/hr) = Number of Units \* Grain Loading (grains/acf) \* Air Flow (acfm) \* 1 lb/7,000 grains \* 60 min/hr

Controlled Emission (lbs/day) = Potential Emissions (lb/hr) \* 24 hr/day

Controlled Emission (tons/yr) = Potential Emissions (lb/hr) \* 8760 hr/yr \* 1 ton/2,000 lbs

# Potential Emission (Uncontrolled):

Potential Emission (tons/yr) = Controlled Emissions (lb/hr) \* 8760 hr/yr \* 1 ton/2,000 lbs /(1- Capture and Control Efficiency)

After Issuance of Po	ermit Limited (tpy)
PM=PM10=PM2.5	PM=PM10=PM2.5
Emissions	Emissions
(lb/hr)	(tons/yr)
2.00	8.76
2.00	8.76

# Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733 Significant Source Modification No.: 001-37527-00025

Significant Permit Modification No.: 001-37552-00025

Reviewer: Kristen Willoughby

Four (4) natural gas-fired process heaters, each with a maximum capacity of 0.02 MMBtu/hour, identified as EUF1-9, EUF1-10, EUF1-11, and EUF1-12.

Heat Input Capacity HHV Potential Throughput MMBtu/hr mmBtu MMCF/yr

0.08 mmscf 0.7

				Pollutant			
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	6.53E-04	2.61E-03	2.61E-03	2.06E-04	3.44E-02	1.89E-03	2.89E-02

<sup>\*</sup>PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

# Methodology

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

# **HAPS Calculations**

			HAPs - Or	ganics		
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.21E-07	4.12E-07	2.58E-05	6.18E-04	1.17E-06	6.46E-04

			HAPs - M	etals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals		
Potential Emission in tons/yr	1.72E-07	3.78E-07	4.81E-07	1.31E-07	7.21E-07	1.88E-06		
					Total HAPs	6.48E-04		
Methodology is the same as above.	ethodology is the same as above.							

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

#### Appendix A: Emission Calculations Reciprocating Internal Combustion Engines - Natural Gas 4-Stroke Rich-Burn (4SRB) Engines

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733 Significant Source Modification No.: 001-37527-00025

Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

Maximum Output Horsepower Rating (hp) Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr) 7600 Maximum Hours Operated per Year (hr/yr) Potential Fuel Usage (MMBtu/yr) 361 High Heat Value (MMBtu/MMscf) Potential Fuel Usage (MMcf/yr) 0.35

		Pollutant											
Criteria Pollutants	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO						
Emission Factor (lb/MMBtu)	9.50E-03	1.94E-02	1.94E-02	5.88E-04	2.21E+00	2.96E-02	3.72E+00						
Potential Emissions (tons/yr)	1.71E-03	3.50E-03	3.50E-03	1.06E-04	0.40	5.34E-03	0.67						

<sup>\*</sup>PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

### Hazardous Air Pollutants (HAPs)

nazaruous Ali Foliulanis (nAFS)		
Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	2.79E-03	5.04E-04
Acrolein	2.63E-03	4.75E-04
Benzene	1.58E-03	2.85E-04
1,3-Butadiene	6.63E-04	1.20E-04
Formaldehyde	2.05E-02	3.70E-03
Methanol	3.06E-03	5.52E-04
Total PAH**	1.41E-04	2.55E-05
Toluene	5.58E-04	1.01E-04
Xylene	1.95E-04	3.52E-05

5.80E-03 Total

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3

Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] \* [Brake Specific Fuel Consumption (Btu/hp-hr)] \* [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu] Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] \* [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

### Abbreviations

PM = Particulate Matter NOx = Nitrous Oxides PM10 = Particulate Matter (<10 um) VOC - Volatile Organic Compounds SO2 = Sulfur Dioxide CO = Carbon Monoxide

CO2 = Carbon Dioxide CH4 = Methane N2O = Nitrous Oxide

CO2e = CO2 equivalent emissions

PM2.5 emission factor is filterable PM2.5 + condensable PM.

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.

<sup>\*\*</sup>PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

# Appendix A: Emission Calculations **Reciprocating Internal Combustion Engines - Diesel Fuel** Output Rating (<=600 HP)

Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025

Reviewer: Kristen Willoughby

Output Horsepower Rating (hp) Maximum Hours Operated per Year Potential Throughput (hp-hr/yr)

235 500 117,500

		Pollutant											
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO						
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067						
Potential Emission in tons/yr	0.13	0.13	0.13	0.12	1.82	0.15	0.39						

<sup>\*</sup>PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

# Hazardous Air Pollutants (HAPs)

		Pollutant											
								Total PAH					
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	HAPs***					
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06					
Potential Emission in tons/yr	3.84E-04	1.68E-04	1.17E-04	1.61E-05	4.85E-04	3.15E-04	3.80E-05	6.91E-05					

<sup>\*\*\*</sup>PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Potential Emission of Total HAPs (tons/yr) 1.59E-03

### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1, 3.4-2, 3.4-3, and 3.4-4.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year] Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

<sup>\*\*\*\*</sup>Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

# Appendix A: Emissions Summary Gasoline Fuel Transfer and Dispensing Operation Volatile Organic Compounds and Hazardous Air Pollutants (HAPs)

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

Gasoline Throughput =	18.1	gallons/day
Gasoline Throughput =	84.00	kgal/yr

### **Volatile Organic Compounds (VOC)**

Emission Source	Emission Factor (lb/kgal of throughput)*	PTE of VOC (tons/yr)
Filling storage tank (splash filling)	11.50	0.48
Tank breathing and emptying	1.00	4.20E-02
Vehicle refueling (displaced losses - uncontrolled)	11.00	0.46
Spillage	0.70	2.94E-02
	Total	1.02

#### Methodology

The gasoline throughput was provided by the source.

\*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Table 5.2-7 Gasoline Throughput (kgal/yr) = [Gasoline Throughput (gallons/day)] \* [365 days/yr] \* [kgal/1000 gal]

PTE of VOC (tons/yr) = [Gasoline Throughput (kgal/yr)] \* [Emission Factor (lb/kgal)] \* [ton/2000 lb]

# Hazardous Air Pollutants (HAPs)

		Hazardous Air Pollutant (HAP)	
		Content (vapor	PTE of HAP
Volatile Organic HAP	CAS#	mass fraction)**	(tons/yr)
Benzene	71-43-2	0.37%	3.76E-03
n-Hexane	110-54-3	0.34%	3.46E-03
Toluene	108-88-3	0.40%	4.07E-03
m-Xylenes	108-38-3	0.11%	1.12E-03

Total PTE of HAPs (tons/yr) 1.24E-02

PTE of Worst Single HAP (tons/yr) 4.07E-03 (Toluene)

# Methodology

\*\*Source: US EPA TANKS Version 4.09 program

PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] \* [PTE of VOC (tons/yr)]

PTE of HAP (tons/yr) = [Hazardous Air Pollutant (HAP) Content (vapor mass fraction)] \* [PTE of VOC (tons/yr)]

# Abbreviations

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

PTE = Potential to Emit

#### Appendix A: Emissions Calculations Welding and Thermal Cutting

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

Includes one (1) motor home assembly welding operation and torch cutting for building and equipment maintenance

PROCESS	Number of Operations	Max. electrode consumption per	Max. electrode consumption per		MISSION FA				EMISS (lb:	SIONS s/hr)		HAPS (lbs/hr)
WELDING		station (lbs/hr)	day (lb/day)1	PM=PM10 =PM2.5	Mn	Ni	Cr	PM=PM10 =PM2.5	Mn	Ni	Cr	
Submerged Arc	0			0.0360	0.0110			0	0	0	0	0
Metal Inert Gas (MIG)(carbon steel)	1	16.17	388.13	0.0055	0.0005			8.89E-02	8.09E-03	0	0	8.09E-03
Stick (E7018 electrode)	0			0.0211	0.0009			0	0	0	0	0
Tungsten Inert Gas (TIG)(carbon steel)	0			0.0055	0.0005			0	0	0	0	0
Oxyacetylene(carbon steel)	0			0.0055	0.0005			0	0	0	0	0
	Number of	Max. Metal	Max. Metal	EMISSION FACTORS				HAPS				
	Stations	Thickness	Cutting Rate	(lb polluta	nt/1,000 inche	s cut, 1" thick	)**		(lbs	s/hr)		(lbs/hr)
FLAME CUTTING		Cut (in.)	(in./minute) <sup>2</sup>	PM=PM10 =PM2.5	Mn	Ni	Cr	PM=PM10 =PM2.5	Mn	Ni	Cr	
Oxyacetylene	1	1	2.36	0.1622	0.0005	0.0001	0.0003	2.30E-02	7.08E-05	1.42E-05	4.25E-05	1.28E-04
Oxymethane	0			0.0815	0.0002		0.0002	0	0	0	0	0
Plasma**	0			0.0039				0	0	0	0	0
EMISSION TOTALS		•				· ·						
Potential Emissions lbs/hr								1.12E-01	8.16E-03	1.42E-05	4.25E-05	8.21E-03
Potential Emissions lbs/day								2.69	0.20	3.40E-04	1.02E-03	0.20
Potential Emissions tons/year	•					•	•	0.49	3.57E-02	6.21E-05	1.86E-04	3.60E-02

#### Notes:

1. Source reported average consumption of 207 lb or wire per day. Production schedule and rate were given as 20 hr/day, 4 days/week, maximum of 1.25 coaches/hr, average of 0.8 coaches/hr Potential wire usage is thus:

U (lb wire/hr) = 207 (lb/hr) x 24 (potential hr/day) / 20 (average hr/day) x 1.25 (max coaches/hr) / 0.8 (average coaches/hr) =

388.13 lb wire/day

2. Source reported that torch cutting for building and equipment maintenance was less than 3,400 inches of steel 1" or less thick per day Cutting rate per minute calculated from:

R (in/min) = 3,400 (inches/day) / [24 (hr/day) x 60 (min/hr)] = 2.36 in/min

#### Methodology:

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

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).

Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values:  $(0.25 \text{ g/min})/(3.6 \text{ m/min}) \times (0.0022 \text{ lb/g})/(39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0.0039 \text{ lb/1},000 \text{ in. cut, } 8 \text{ mm thick}$ 

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

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

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

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

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

### **TSD Appendix A: Emissions Calculations**

# Appendix A: Emission Calculations Air Make-Up Unit Natual Gas Combustion

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

					C	Criteria Pollut	ants		
			PM*	PM10*	PM2.5*	SO2	NOx	VOC	СО
	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0		
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)						
Booth 8 Heated AMU	8.3	71.282	0.068	0.271	0.271	0.021	3.564	0.196	2.994
Total	0.07	0.27	0.27	0.02	3.56	0.20	2.99		

<sup>\*</sup>PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.

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

				HAPs - Organics				HAPs - Metals					Total HAPs	
_			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	TOTALLA	
Emission Factor in lb/MM0			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.8880	
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)		Potential Emissions (tons/yr)										
Booth 8 Heated AMU	8.3	71.282	7.5E-05	4.3E-05	2.7E-03	6.4E-02	1.2E-04	1.8E-05	3.9E-05	5.0E-05	1.4E-05	7.5E-05	6.7E-02	
Total	7.5E-05	4.3E-05	2.7E-03	6.4E-02	1.2E-04	1.8E-05	3.9E-05	5.0E-05	1.4E-05	7.5E-05	6.7E-02			

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

#### Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

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

Potential Emission (tons/yr) = Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) \* (1 ton/2,000 lb)

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

# Appendix A: Emission Calculations Hand Held Sanders

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

0.03

Clear Coat Sandi	ng for Double Cl	ear Coat Booth #8	}				Unco	ntrolled Emi	ssions	Con	trolled Emis	sions	Limited Emissions		
					Outlet Grain		PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM10/	PM10/	
			Airflow	Airflow	Loading	Filter	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	
Process	Collector	Stack ID	(liters/min)	(ft3/min)	(Gr/DSCF)	Efficiency	(lb/hr)	(lb/day)	(Ton/yr)	(lb/hr)	(lb/day)	(Ton/yr)	(lb/hr)	(Ton/yr)	
CC Sanding 1	Portable -1	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64	
CC Sanding 2	Portable -2	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64	
CC Sanding 3	Portable -3	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64	
CC Sanding 4	Portable -4	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64	
CC Sanding 5	Portable -5	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64	

95%

Totals:

0.58

3.49

13.94

83.65

2.54

15.27

0.03

0.17

0.70

4.18

0.13

0.76

0.15

0.87

0.64

3.82

# Methodology

CC Sanding 6

Portable -6

PTE of PM/PM10/PM2.5 Controlled (lbs/hr) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM10/PM2.5 Controlled (lb/day) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 24 (hrs/day)

3200

PTE of PM/PM10/PM2.5 Controlled (tons/yr) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

113

PTE of PM/PM10/PM2.5 Uncontrolled (lbs/hr) = PTE of PM/PM10/PM2.5 Controlled (lbs/hr) / (1-Control Efficiency)

Vents Indoors

PTE of PM/PM10/PM2.5 Uncontrolled (lbs/day) = PTE of PM/PM10/PM2.5 Controlled (lbs/day) / (1-Control Efficiency)

PTE of PM/PM10/PM2.5 Uncontrolled (tons/yr) = PTE of PM/PM10/PM2.5 Controlled (tons/yr) / (1-Control Efficiency)

PTE of PM10/PM2.5 Limited (tons/yr) = PTE of PM/PM10/PM2.5 Uncontrolled (tons/yr) x (1-75 %)

PTE of PM10/PM2.5 Limited (lb/hr) = PTE of PM10/PM2.5 Limited (tons/yr) x 2000 (lb/ton / 8760 (hr/yr)

# Appendix A: Emission Calculations PTE Clear Coat Operation Summary

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025

Reviewer: Kristen Willoughby

	Uncontrolled Potential to Emit (tons/yr)											
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	voc	СО	Total HAPs	Single HAP (Glycol Ether)			
Clear Coat Paint Booth PB#8	27.10	27.10	27.10	-	-	55.59	-	12.43	10.78			
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	0.07	-			
Prep Sanding	15.27	15.27	15.27	-	-	-	-	-	-			
Total	42.44	42.64	42.64	0.02	3.56	55.79	2.99	12.50	10.78			

<sup>\*</sup> PM2.5 listed is direct PM2.5

	Potential to Emit after Control (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	voc	СО	Total HAPs	Single HAP (Glycol Ether)		
Clear Coat Paint Booth PB#8	1.36	1.36	1.36	-	-	55.59	-	12.43	10.78		
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	0.07	-		
Prep Sanding	0.76	0.76	0.76	-	-	i	-	-	-		
Total	2.19	2.39	2.39	0.02	3.56	55.79	2.99	12.50	10.78		

<sup>\*</sup> PM2.5 listed is direct PM2.5

		Potential	to Emit after Is	suance (ton	ıs/yr)				
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	voc	СО	Total HAPs	Single HAP (Glycol Ether)
Clear Coat Paint Booth PB#8	1.36	1.36	1.36	-	-	24.70	-	12.43	10.78
Air Make-Up Unit Heater for PB#8	0.07	0.27	0.27	0.02	3.56	0.20	2.99	0.07	-
Prep Sanding	15.27	3.82	3.82	-	-	-	-	-	-
Total	16.69	5.44	5.44	0.02	3.56	24.90	2.99	12.50	10.78

<sup>\*</sup> PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

### Appendix A: Emission Calculations PTE Clear Coat Spray Booth #8

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025 Significant Permit Modification No.: 001-37552-00025 Reviewer: Kristen Willoughby

### Clear Coat Finish Booth #8 - Surface Coating Emissions

Uncontrolled and Unlimited Potential Emissions based on 1.25 RV unit per hour plant capacity at 8760 Hours per year

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water and Exempts	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Potential Production (units/hr)	Maximum Production (unit/year)	Pounds VOC per gallon of coating less water and Exempts	Pounds VOC per gallon of coating	PTE VOC (ton/yr)	Uncontrolled PTE PM/PM10/PM 2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Particulate Control Efficiency	Controlled PTE PM/PM10/ PM2.5 (ton/yr)
Clear Coat Spray Booth #8																	
RV Clear As-Applied with Activator	8.37	51.86%	17.3%	34.6%	16.2%	43.94%	3.51	1.25	10950.0	3.45	2.89	55.59	27.10	6.58	65%	95%	1.36
Max												55.59	27.10				1.36

						HAP Constitue	ents					Emissions		
Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/year)	Weight % Glycol Ether	Weight % MIBK	Weight % Xylene	Weight % Hexamethylene- di-isocyanate	Ethylbenzene	Glycol Ether Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Hexamethylene- di-isocyanate Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total HAPs (ton/yr)
Clear Coat Spray Booth #8														
RV Clear As-Applied with Activator	8.37	3.51	10950.0	6.70%	0.85%	0.12%	0.03%	0.03%	10.78	1.37	0.19	0.05	0.05	12.43
												"Worst Case" I	ndividual HAP	10.78

Worst Case" Individual HAP 10.78
"Worst Case" Total HAPs 12.43

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

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

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

Gallons of Material per Unit is based on volume of coating used to apply clear coating to one RV Unit

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

# Appendix A: Emission Calculations Air Make-Up Unit Natural Gas Combustion

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

					(	Criteria Pollut	ants					GHGs		
			PM*	PM10*	PM2.5*	SO2	NOx	VOC	СО	CO2	CH4	N2O	GHG Mass- Based	CO2e
	Emission Factor	or in lb/MMCF	1.9	7.6	7.6	0.6	100.0	5.5	84.0	120000	2.3	2.2		
	Heat board   Petroff						**see below							
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)					Po	otential Emis	ssions (tons/	yr)				
Booth 8 Heated AMU			0.068	0.271	0.271	0.021	3.564	0.196	2.994	4276.94	0.08	0.08	4277.10	4302.36
Total	0.07	0.27	0.27	0.02	3.56	0.20	2.99	4276.94	0.08	0.08	4,277.10	4,302.36		

<sup>\*</sup>PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.

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

				ŀ	HAPs - Orga	nics			F	IAPs - Meta	ls		Total HAPs
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	TOTAL FIARS
	Emission Factor	or in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.8880
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)					Potentia	al Emissions	(tons/yr)				
Booth 8 Heated AMU	71.282	7.5E-05	4.3E-05	2.7E-03	6.4E-02	1.2E-04	1.8E-05	3.9E-05	5.0E-05	1.4E-05	7.5E-05	6.7E-02	
Total	otal				2.7E-03	6.4E-02	1.2E-04	1.8E-05	3.9E-05	5.0E-05	1.4E-05	7.5E-05	6.7E-02

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

# Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

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

Potential Emission (tons/yr) = Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) \* (1 ton/2,000 lb)

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

# Appendix A: Emission Calculations Hand Held Sanders

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

0.03

Clear Coat Sandi	ng for Double Cl	ear Coat Booth #8	3				Unco	ntrolled Emi	ssions	Cont	trolled Emiss	sions	Limited E	missions
					Outlet Grain		PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM/PM10/	PM10/	PM10/
			Airflow	Airflow	Loading	Filter	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5	PM2.5
Process	Collector	Stack ID	(liters/min)	(ft3/min)	(Gr/DSCF)	Efficiency	(lb/hr)	(lb/day)	(Ton/yr)	(lb/hr)	(lb/day)	(Ton/yr)	(lb/hr)	(Ton/yr)
CC Sanding 1	Portable -1	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64
CC Sanding 2	Portable -2	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64
CC Sanding 3	Portable -3	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64
CC Sanding 4	Portable -4	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64
CC Sanding 5	Portable -5	Vents Indoors	3200	113	0.03	95%	0.58	13.94	2.54	0.03	0.70	0.13	0.15	0.64

95%

Totals:

0.58

3.49

2.54

15.27

13.94

83.65

0.03

0.17

0.70

4.18

0.13

0.76

0.15

0.87

0.64

3.82

### Methodology

CC Sanding 6

Grain loading and airflow are based on manufacturers specifications provided by the source.

Portable -6

PTE of PM/PM10/PM2.5 Controlled (lbs/hr) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

 $PTE of PM/PM10/PM2.5 \ Controlled \ (lb/day) = Outlet \ Grain \ Loading \ (gr/dscf) \ x \ Max. \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Flow \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Air \ Rate \ (scfm) \ x \ 60 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Rate \ (scfm) \ x \ 40 \ mins/hr \ x \ 1/7000 \ lb/gr \ x \ 24 \ (hrs/day) \ Air \ Rate \ (scfm) \ Air \ Rate \ (scf$ 

3200

PTE of PM/PM10/PM2.5 Controlled (tons/yr) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

113

PTE of PM/PM10/PM2.5 Uncontrolled (lbs/hr) = PTE of PM/PM10/PM2.5 Controlled (lbs/hr) / (1-Control Efficiency)

Vents Indoors

PTE of PM/PM10/PM2.5 Uncontrolled (lbs/day) = PTE of PM/PM10/PM2.5 Controlled (lbs/day) / (1-Control Efficiency)

 $PTE \ of \ PM/PM10/PM2.5 \ Uncontrolled \ (tons/yr) = PTE \ of \ PM/PM10/PM2.5 \ Controlled \ (tons/yr) \ / \ (1-Control \ Efficiency)$ 

PTE of PM10/PM2.5 Limited (tons/yr) = PTE of PM/PM10/PM2.5 Uncontrolled (tons/yr) x (1-75 %)

PTE of PM10/PM2.5 Limited (lb/hr) = PTE of PM10/PM2.5 Limited (tons/yr) x 2000 (lb/ton / 8760 (hr/yr)

# REV Recreation Group Process Flow Diagram Clear Coat Paint Booth PB#8

Company Name: Rev Recreation Group, Inc.

Address City IN Zip: 1031 U.S. 224 East, Decatur, IN 46733

Significant Source Modification No.: 001-37527-00025
Significant Permit Modification No.: 001-37552-00025
Reviewer: Kristen Willoughby

75,000 CFM Exhaust to Atmosphere 8.3 MMBtu/hr **Heated Air Natural Gas** Make-Up **Paint Overspray** 75,000 CFM **Arrestor Filters** 4000 Clear Coat Paint Booth RVs PB#8 with HVLP Paint Spray Guns per Year Clear Coat Prep / Sanding Area Clear Coat Painting Area Clear Coat Paint and Activator 3.51 Gal/unit



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* 

Carol S. Comer

September 28, 2016

Mr. Tim Quinton Rev Recreation Group, Inc. 1031 U.S. 224 East, PO Box 31 Decatur, IN 46733

Re: Public Notice

Rev Recreation Group, Inc.

Permit Level: Title V Significant Source Modification and Significant Permit Modification

Permit Number: 001-37527-00025 and 001-37552-00025

Dear Mr. Quinton:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Decatur Daily Democrat in Decatur, Indiana publish the abbreviated version of the public notice no later than September 30, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Decatur Public Library, 128 South 3<sup>rd</sup> Street in Decatur, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Kristen Willoughby, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

Vivian Haun

Vivian Haun Permits Branch Office of Air Quality

Enclosures PN Applicant Cover letter 2/17/2016







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Michael R. Pence

Carol S. Comer

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 27, 2016

Decatur Daily Democrat 141 South Second Street PO Box 1001 Decatur, IN 46733

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Rev Recreation Group, Inc., Adams County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than September 30, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

# To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun Permit Branch Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification Permit Number: 001-37527-00025 and 001-37552-00025

Enclosure PN Newspaper.dot 8/27/2015





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Michael R. Pence Governor Carol S. Comer

September 28, 2016

To: Decatur Public Library

From: Matthew Stuckey, Branch Chief

Permits Branch Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air

Permit

Applicant Name: Rev Recreation Group, Inc.

Permit Number: 001-37527-00025 and 001-37552-00025

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures PN Library.dot 2/16/2016







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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence

Carol S. Comer Commissioner

# **Notice of Public Comment**

September 28, 2016 Rev Recreation Group, Inc. 001-37527-00025 and 001-37552-00025

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure PN AAA Cover.dot 2/17/2016







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Michael R. Pence Governor

Carol S. Comer Commissioner

# AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 28, 2016

A 30-day public comment period has been initiated for:

Permit Number: 001-37527-00025 and 001-37552-00025

Applicant Name: Rev Recreation Group, Inc.

Location: Decatur, Adams County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at: http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management Office of Air Quality, Permits Branch 100 North Senate Avenue Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at <a href="mailto:chammack@idem.IN.gov">chammack@idem.IN.gov</a> or (317) 233-2414.

Affected States Notification.dot 2/17/2016





# Mail Code 61-53

IDEM Staff	VHAUN 9/28/201	16		
	<b>REV Recreation</b>	Group 001-37527 and 37552-00025	DRAFT	AFFIX STAMP
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	MAILING ONE	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Tim Quinton REV Recreation Group 1031 US 224 East PO Box 31 Decatur IN 46733	(Source CAA	TS)							
2		Doug Hormann HR/EHS REV Recreation Group 1031 US 224 East PO Box 31 Decate	ur IN 46733	(RO CAATS)							
3		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local	Official)								
4		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 De	catur IN 467	733-1673 <i>(He</i>	alth Department)						
5		Decatur Public Library 128 S 3rd St Decatur IN 46733-1691 (Library)									
6		Decatur City Council and Mayors Office 172 N. 2nd Street Decatur IN 46733-1609 (	Local Official	)							
7		Mr. John Wellspring Keramida, Inc 401 N College Avenue Indianapolis IN 46202 (Co	nsultant)								
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			mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.