



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 5, 2004

100 North Senate Avenue
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(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
RE: Monoco Coach Corporation / 039-7511-00182
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Monaco Coach Corporation
2700 S. Nappanee Street
Elkhart, IN 46573**

(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.: T 039-7511-00182	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 5, 2004 Expiration Date: May 5, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary towable and motorized recreational vehicle manufacturing plant.

Responsible Official: Richard E. Bond, Chief Administrative Officer
Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Phone Number: 574-862-7574
SIC Code: 3716, 3792
County Location: Elkhart
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This recreational vehicle manufacturing plant consists of several in-house plants which are located within the same city block bordered by Mishawaka Rd., S. Nappanee Street, and W. Hively :

- (a) Plant 3 is located at 1722 Mishawaka Road;
- (b) Plants 8 and 50 are located at 2700 S. Nappanee Street; and
- (c) Plants 4, 5, 6, 7, and 9 are located at 1809 W. Hively.

Since the in-house plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

Service Paint Area - Plant 4

- (a) A surface coating booth, identified as P4-1, constructed in 1990, equipped with an air assisted airless spray applicator and an airless spray applicator with a maximum capacity to coat 2.0 metal or fiberglass reinforced plastic (FRP) recreational vehicles (RVs) per hour, using dry filters to control particulate matter, and exhausting to stack SV-1; the unit can also perform minor "patch" FRP repair
- (b) Three (3) surface coating repair booths, identified as P4-7, P4-8, and P4-8A, constructed in 1990, each equipped with air atomized spray applicators, each with a maximum capacity to coat 1.0 metal or fiberglass reinforced plastic (FRP) RV per hour, using dry filters to

control particulate matter, and exhausting to stacks SV-7, SV-8, and SV-8A; the units can also perform minor "patch" FRP repair

- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12
- (d) Two (2) paint bays, identified as P4-37 and P4-38, constructed in December 2000, each with a maximum capacity to coat 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-37 and SV-38; the units can also perform minor "patch" FRP repair

Plant 3

- (e) A towable assembly area, which includes caulks, adhesives, paints, and solvents, identified as P3-2, constructed in 1990, with a maximum capacity of 2.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting to stack D-1

Plant 6

- (g) A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, with a maximum capacity of 2.5 units per hour, with no emission control and exhausting to general building exhaust
- (h) A door manufacturing operation, identified as P6-29, constructed in 1990, consisting of three (3) welding stations, with a maximum capacity of 4.5 units/hour, with no emission control and exhausting to general building exhaust
- (i) A paint booth for metal doors, identified as P6-28, constructed in 1997, with a maximum capacity of 4.5 units per hour, using filtered exhaust as particulate control and exhausting to stack SV-28

Customer Service Facilities - Plants 7 & 9

- (j) A customer service facility, constructed in 1990, with miscellaneous caulks, sealants, touch-up metal surface coating and solvent emissions, with no emission control, and exhausting to general building exhaust with a maximum capacity of 2.25 RVs per hour
- (k) A natural gas fired boiler, identified as B1, installed in 1963, with a maximum input capacity of 4.375 MMBtu/hour

Paint /Fiberglass Plant - Plant 5

- (l) A fiberglass mold prep and clean-up operation, identified as P5-1, constructed in 1998, with a maximum capacity of parts which can accommodate 4.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (m) A fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and four

- (4) resin application stations, identified as FB-1, FB-2, FB-3, and FB-4, constructed in 1998, each with a maximum capacity of parts which can accommodate 4.5 RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-13, SV-14, SV-15, SV-16, SV-19, SV-20, SV-24, SV-25 and SV-26
- (n) A fiberglass closed tooling operation, identified as CT-1, constructed in 1998, with a maximum capacity to build parts for 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18
- (o) A fiberglass cure booth, identified as FCB-1, and a gelcoat cure booth, identified as GCB-1, constructed in 1998, each with a maximum capacity to cure parts which will accommodate 4.5 RVs per hour, with no emission control, and exhausting to stacks SV-21, SV-22, SV-26, and SV-27
- (p) One (1) fiberglass final finish area, identified as FF-1, constructed in 1998, with a maximum capacity of parts which will accommodate 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18
- (q) Two (2) closed loop grinding booths, identified as DC-FG1 and DC-FG2, constructed in 1998, each with a maximum capacity of parts to accommodate 4.5 RVs per hour, with dry filters to control particulate matter emissions, and exhausting to general building exhaust
- (r) Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, coating metal parts to produce a maximum of 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and exhausting to stacks SV-5, SV-6, and SV-9
- (s) Two (2) metal surface coating booths, identified as P5-10 and P5-11, constructed in 1990, with a combined maximum production capacity of small metal parts to produce 4.0 RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-10 and SV-11

Roadmaster Plant - Plant 50

- (t) Seventy two (72) welding stations and ten (10) cutting tables, constructed in May 2000, with a combined maximum capacity of 4.5 chassis per hour, with no emission control
- (u) Four (4) surface coating booths, identified as R-30, R-31, R-32, and R-33, constructed in May 2000, each with a maximum capacity of 4.5 metal chassis per hour, using dry filters to control particulate matter, and exhausting to stacks SV-30, SV-31, SV-32, and SV-33

Aftermarket Fiberglass Plant - Plant 8

- (v) Two (2) fiberglass production areas, identified as F-34 and F-35, constructed in September 2000, with a combined maximum capacity of parts to produce 1 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-34 and SV-35
- (w) A closed loop grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to general building exhaust

Emission Unit Notation

Equipment lists from Construction Permit # 039-9835-00182, issued on July 10, 1998, Construction Permit # 039-4577-00182, issued on March 26, 1996, and Source Modification # 039-11468-00182,

issued May 3, 2000, do not accurately describe current emission units at the source, because some units have been modified or eliminated from the source, or were erroneously described in a previously issued permit. Equipment lists from previously issued permits will be replaced by Section A.3 Emission Units and Pollution Control Equipment Summary and Section A.4 Specifically Regulated Insignificant Activities in this Part 70 permit.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Cold cleaner degreasers with remote solvent reservoirs [326 IAC 8-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2]

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).

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]

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

B.3 Enforceability [326 IAC 2-7-7]

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.4 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.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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (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 or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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 in 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.
- (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;
 - (2) 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]

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-4]

- (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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may

invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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 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), (c), or (e), 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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

- (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(36)) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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.

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 and 326 IAC 2-7-10.5.

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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.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, I/M & Billing Section), to determine the appropriate permit fee.

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 [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
 - (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. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- 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 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance as defined in 40 CFR Part 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 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and

prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
 - (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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]**

- (a) The Permittee shall submit an emissions statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The annual emission statement 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 requirement from CP 039-9835-00182, issued July 10, 1998, Condition C.11(a) and (b), and the requirement from CP 039-4577-00182, issued on March 26, 1996, Operation Condition #8, describing 326 IAC 2-6 Emission Reporting requirements, are not applicable because they have been replaced by similar descriptions of Emission Reporting requirements which developed from the resolution of appeal to CP-039-9835-00182, Cause No. 98-A-J-2075.

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

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) The requirements from CP-039-9835-00182, issued July 10, 1998, Conditions D.1.10(a)(2), D.2.3(a)(2) and D.4.8(a)(2), and from SSM 039-11468-00182, issued May 3, 2000, Condition D.1.11(a)(2), requiring a log of the dates of use for VOC and HAP, are not applicable due to resolutions to the appeal to CP-039-9835-00182, Cause No. 98-A-J-2075. The changes were made because Monaco does not have daily limits for VOC and HAP usage. The resolutions are also applicable to VOC and HAP record keeping requirements from SSM 039-11468-00182.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report

shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

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 the standards for recycling and emissions reduction:

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

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52 (e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

- (1) The source is no longer a major source of hazardous air pollutants, as defined in 40

CFR 63.2;

- (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Metal Surface Coating Units and All Degreasers

Service Paint Area - In-house Plant 4

- (a) A surface coating booth, identified as P4-1, constructed in 1990, equipped with an air assisted airless spray applicator and an airless spray applicator with a maximum capacity to coat 2.0 metal or fiberglass reinforced plastic (FRP) recreational vehicles (RVs) per hour, using dry filters to control particulate matter, and exhausting to stack SV-1; the unit can also perform minor "patch" FRP repair
- (b) Three (3) surface coating repair booths, identified as P4-7, P4-8, and P4-8A, constructed in 1990, each equipped with air atomized spray applicators, each with a maximum capacity to coat 1.0 metal or fiberglass reinforced plastic (FRP) RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-7, SV-8, and SV-8A; the units can also perform minor "patch" FRP repair
- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12
- (d) Two (2) paint bays, identified as P4-37 and P4-38, constructed in December 2000, each with a maximum capacity to coat 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-37 and SV-38; the units can also perform minor "patch" FRP repair

In-house Plant 3

- (e) A towable assembly area, which includes caulks, adhesives, paints and solvents, identified as P3-2, constructed in 1990, with a maximum capacity of 2.5 RVs per hour, with no emission control and exhausting to general building exhaust

In-house Plant 6

- (g) A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, with a maximum capacity of 2.5 units per hour, with no emission control and exhausting to general building exhaust
- (i) A paint booth for metal doors, identified as P6-28, constructed in 1997, with a maximum capacity of 4.5 units per hour, using filtered exhaust as particulate control and exhausting to stack SV-28

Customer Service Facilities - In-house Plants 7 & 9

- (j) A customer service facility, constructed in 1990, with miscellaneous caulks, sealants, touch-up metal surface coating and solvent emissions, with no emission control, and exhausting to general building exhaust with a maximum capacity of 2.25 RV's per hour

Paint /Fiberglass Plant - In-house Plant 5

- (r) Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, coating metal parts to produce a maximum of 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and exhausting to stacks SV-5, SV-6, and SV-9
- (s) Two (2) metal surface coating booths, identified as P5-10 and P5-11, constructed in 1990, with a combined maximum production capacity of small metal parts to produce 4.0 RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-10 and SV-11

Roadmaster Plant - In-house Plant 50

- (u) Four (4) surface coating booths, identified as R-30, R-31, R-32, and R-33, constructed in May 2000, each with a maximum capacity 4.5 metal chassis per hour, using dry filters to control particulate matter, and exhausting to stacks SV-30, SV-31, SV-32, and SV-33

Insignificant Activity

- (a) Cold cleaner degreasers with remote solvent reservoirs

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

Emission Limitations and Standards [326 IAC 2-7-5(1)] [40 CFR 63.41]

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to SSM 039-11468-00182 issued on May 3, 2000 and modified through the Part 70 Operating permit, the surface coating booths R-30, R-31, R-32, and R-33, shall each be limited to less than ten (10) tons of any single input HAP and less than twenty-five (25) tons of input HAP combination per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with these limits makes 326 IAC 2-4.1 not applicable.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] [326 IAC 20]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981, and are applicable to the affected source.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the control devices for these facilities.

D.1.5 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the PM from surface coating operations P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P6-28, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32 and R-33 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.6 Miscellaneous Metal Coating [326 IAC 8-2-9]

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the owner or operator shall not allow the discharge into the atmosphere volatile organic compound (VOC) from application equipment of spray booths/areas P4-1, P4-7, P4-8, P4-8A, P4-37, P4-38, P3-2, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32, and R-33 in excess of 3.5 pounds of VOC per gallon of coating less water for non-clear, air dried, forced warm air dried or extreme performance coatings, and 4.3 pounds of VOC per gallon of coating less water for clear coatings, excluding water, as delivered to the applicator.
- (d) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from application equipment of spray booths/areas P4-1, P4-7, P4-8, P4-8A, P4-37, P4-38, P3-2, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32, and R-33 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.7 Cold Cleaner Operation [326 IAC 8-3-2]

The owner or operator of the insignificant cold cleaner degreasers shall:

- (a) Equip the cleaners with a cover;
- (b) Equip the cleaners with a facility for draining cleaned parts;
- (c) Close the degreaser covers whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and do not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.8 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P5-5, P5-6, P5-9, P5-10, P5-11, P6-28 and R-30 through R-33 shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with the manufacturer's specifications. This requirement to operate the control is not federally enforceable.
- (b) Any change or modification which may increase the coating application rate to greater than 5 gallons per day shall require prior OAQ approval for P3-2 and the customer service facility.

Compliance Determination Requirements

D.1.9 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP and VOC content and usage limitations contained in Conditions D.1.1 and D.1.6 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 "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program.
 - (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (c) The requirements from CP-039-9835-00182, issued July 10, 1998, Conditions D.4.6, D.4.7, D.4.8(b), requiring monitoring, overspray observations, and daily visible emissions notations and record keeping for dry filters, are not applicable because the source has requested that such requirements be replaced by operator training requirements, as described in above Condition D.1.10(a).

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

D.1.11 Record Keeping Requirements

- (c) To document compliance with Conditions D.1.1 and D.1.9, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The single HAP content and combination of HAP content of each coating material, solvent, and clean-up solvent used;
 - (2) The clean-up solvent usage for each month;
 - (3) The total usage for each single HAP and the total for the combination of HAP usage for each month;
 - (4) The weight of each single HAP and the weight of the combination of HAP emitted from coatings and cleanup for each compliance period; and
 - (5) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with Conditions D.1.6 and D.1.9, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each metal surface coating material and solvent used;
 - (2) The volume weighted VOC content of the metal surface coatings and solvents used for each month;
 - (3) The total VOC usage for metal surface coatings for each month;
 - (4) The weight of VOCs emitted from metal surface coatings and solvents for each compliance period; and
 - (5) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, 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 for cleanup solvents.
- (c) To document compliance with Conditions D.1.4 and D.1.10, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with D.1.8(b), coating application rates shall be maintained for P3-2 and the customer service facility.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.13 Notification Requirements [40 CFR 63.3910] [326 IAC 20]

- (a) The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) The Permittee must submit the initial notification no later than January 2, 2005.
- (c) The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart M, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: FRP Surface Coating Units

Service Paint Area - In-house Plant 4

- (a) A surface coating booth, identified as P4-1, constructed in 1990, equipped with an air assisted airless spray applicator and an airless spray applicator with a maximum capacity to coat 2.0 metal or fiberglass reinforced plastic (FRP) recreational vehicles (RVs) per hour, using dry filters to control particulate matter, and exhausting to stack SV-1; the unit can also perform minor "patch" FRP repair
- (b) Three (3) surface coating repair booths, identified as P4-7, P4-8, and P4-8A, constructed in 1990, each equipped with air atomized spray applicators, each with a maximum capacity to coat 1.0 metal or fiberglass reinforced plastic (FRP) RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-7, SV-8, and SV-8A; the units can also perform minor "patch" FRP repair
- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12
- (d) Two (2) paint bays, identified as P4-37 and P4-38, constructed in December 2000, each with a maximum capacity to coat 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-37 and SV-38; the units can also perform minor "patch" FRP repair

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

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

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [326 IAC 20]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart P.
- (b) Since the applicable requirements associated with the compliance options are not included

and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the control devices for these facilities.

D.2.4 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the PM from surface coating operations P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.5 New facilities; general reduction requirement [326 IAC 8-1-6]

- (a) Pursuant to CP 039-4577-00182, issued on March 26, 1996, the units P4-1, P4-7, P4-8, P4-8A, and P4-12 shall comply with 326 IAC 8-1-6, which requires use of Best Available Control Technology (BACT). The BACT for these units has been determined to be the use of hand wiped and air atomization spray coating application methods. These application methods shall be used at all times that the FRP surface coating emission units are operated. This shall satisfy the requirements of 326 IAC 8-1-6.
- (b) Pursuant to SSM 039-11468-00182 issued on May 3, 2000 and revised through the Part 70 Operating Permit, the input of VOC to each paint bay P4-37 and P4-38, when coating FRP substrates, shall be less than 25 tons of VOC per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential emissions of VOC to less than 25 tons per twelve (12) consecutive month period and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.2.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations shall be controlled by dry filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications. This requirement to operate the control is not federally enforceable.

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.5 (b) 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 "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program.
- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each metal surface coating material and solvent used;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period; and

- (5) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with condition D.2.3 and D.2.8, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.11 Notification Requirements [40 CFR 63.4510] [326 IAC 20]

- (a) The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart P, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart P. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.
- (c) The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart P, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart P.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: FRP Production Units

Paint /Fiberglass Plant - In-house Plant 5

- (l) A fiberglass mold prep and clean-up operation, identified as P5-1, constructed in 1998, with a maximum capacity of parts which can accommodate 4.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (m) A fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and four (4) resin application stations, identified as FB-1, FB-2, FB-3, and FB-4, constructed in 1998, each with a maximum capacity of parts which can accommodate 4.5 RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-13, SV-14, SV-15, SV-16, SV-19, SV-20, SV-24, SV-25 and SV-26
- (n) A fiberglass closed tooling operation, identified as CT-1, constructed in 1998, with a maximum capacity to build parts for 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18
- (o) A fiberglass cure booth, identified as FCB-1, and a gelcoat cure booth, identified as GCB-1, constructed in 1998, each with a maximum capacity to cure parts which will accommodate 4.5 RVs per hour, with no emission control, and exhausting to stacks SV-21, SV-22, SV-26, and SV-27
- (p) One (1) fiberglass final finish area, identified as FF-1, constructed in 1998, with a maximum capacity of parts which will accommodate 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18

Aftermarket Fiberglass Plant - In-house Plant 8

- (v) Two (2) fiberglass production areas, identified as F-34 and F-35, constructed in September 2000, with a combined maximum capacity of parts to produce 1 recreational vehicle per hour, using dry filters to control particulate matter, and exhausting to stacks SV-34 and SV-35

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

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

D.3.1 New Source Toxics Control [326 IAC 2-4.1-1] [40 CFR 63.41]

- (a) MACT for FRP production units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, and FF-1 shall be the following:
 - (1) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
 - (A) Monthly usage by weight, weight percent content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content,

method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors used shall be approved by IDEM, OAQ.

- (B) The emission factors approved for use by IDEM, OAQ are taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	45
Production Resin, Manual or Mechanical Application, - - Noncorrosion Resistant Filled (\$35% by weight)	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

$$Em_A \leq (M_R * E_{Ra}) + (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
 M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
 E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls

*Units: mass = tons
 emission factor = lbs of monomer per ton of resin or gel coat
 emissions = lbs of monomer*

- (3) Non-atomized spray application technology shall be used in all unfilled production resins.

Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement process (FIP), resin impregnators, or other non-spray applications of a design and specifications approved by IDEM, OAQ. IDEM, OAQ approval of non-atomized spray application technologies is not required if the Permittee uses one or more of the non-atomized spray technologies identified above.

If after one year of operation it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques approved by IDEM, OAQ. Examples of other emission reduction techniques that are approved include lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. The emission reductions from use of vapor suppression and vacuum bagging/bonding must be determined and approved by IDEM, OAQ prior to use. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (4) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that 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.

- (5) The following listed work practices shall be implemented:

- (A) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup.
 - (B) For VOC- and/or HAP-containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work areas.
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be closed when not in use.
 - (iii) Solvent-saturated cleanup rags shall be stored, transported, and discarded in containers that are tightly closed.
 - (iv) Spray guns shall be designed to be cleaned without needing to spray solvent into the air.
 - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (C) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.
- (b) Condition D.1.2 from CP-039-9835-00182, issued July 10, 1998, is not applicable in its entirety because IDEM, OAQ, has decided that special monomer content limits for tooling operations and different methods for styrene emissions calculations should be included in the MACT requirements. Therefore, condition D.1.2 from CP-039-9835-00182 has been replaced in this Part 70 permit by similar condition D.3.1(a).
- (c) Pursuant to SSM 039-11468-00182, issued May 3, 2000, and revised through the Part 70 Operating Permit, combined units F-34 and F-35 at the Aftermarket Fiberglass Plant shall be limited such that the emissions from the use of coatings, resins, gel coats, dilution solvents and cleanup solvents of any single hazardous air pollutant shall be limited to less than ten (10) tons per twelve (12) consecutive month period, and the emissions of any combination of HAP shall be limited to less than twenty five (25) tons per twelve (12) consecutive month where compliance is determined at the end of each month. Therefore, 326 IAC 2-4.1-1 (New Facilities: General Reduction Requirements) does not apply.
- (1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission

factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices for these facilities.

D.3.3 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the PM from FRP production units GB-1, FB-1, FB-2, FB-3, FB-4, F-34, and F-35 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.3.4 New facilities; general reduction requirement [326 IAC 8-1-6]

(a) Pursuant to CP 039-9835-00182, issued on July 10, 1998, FRP production units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1 and FF-1 are subject to 326 IAC 8-1-6. The requirements for Best Available Control Technology (BACT) to control VOC emissions shall be satisfied by the requirements of 326 IAC 2-4.1-1(New Source Toxics Control) specified in Condition D.3.1.

(b) Pursuant to SSM 039-11468-00182, issued on May 3, 2000, combined FRP units F-34 and F-35 shall be limited such that the potential to emit VOC from the use of coatings, resins, gel coats, dilution solvents and cleanup solvents, shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Therefore, BACT will not apply.

(1) Monthly usage by weight, content of monomer, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For VOC-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.3.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from FB-1, FB-2, FB-3, FB-4, F-34 and F-35 shall be controlled by dry filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.6 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the two (2) fiberglass production areas, identified as F-34 and F-35 shall comply with the provisions of 326 IAC 20-25-3:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke Shrinkage Controlled	60*
Tooling	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.
 * Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition 3.13 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using non-atomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spray (if approved by IDEM, OAQ) or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.

- (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.3.7 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented for all fiberglass operations:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55)

gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.3.8 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in any resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.3.9 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.3.10 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

- (a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:
- (1) The fiberglass mold prep and clean-up operation, identified as P5-1;
 - (2) The fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and the four (4) resin application stations, identified as FB-1, FB-2, FB-3;
 - (3) The fiberglass closed tooling operation, identified as CT-1;
 - (4) The fiberglass cure booth, identified as FCB-1, and the gelcoat cure booth, identified as GCB-1;
 - (5) The one (1) fiberglass final finish area, identified as FF-1;
 - (6) The two (2) fiberglass production areas, identified as F-34 and F-35.
- Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

Compliance Determination Requirements

D.3.11 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

- (a) Compliance with the VOC and HAP content and usage limitations contained in Conditions D.3.1(a), D.3.1(c) and D.3.4(b) 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 "as supplied" and "as applied" VOC data. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the HAP monomer content limitations in condition D.3.1(a)(2) and D.3.6(a) shall be determined by one of the following:
- (1) The manufacturer's certified product data sheet.
 - (2) The manufacturer's material safety data sheet.

- (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (4) An alternate method approved by IDEM, OAQ.

D.3.12 Operator Training Requirements

- (a) In order to demonstrate compliance with Condition D.3.3, the Permittee shall implement an operator-training program as follows:
 - (1) All operators that perform FRP production operations or FRP area maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (c) The requirements from CP-039-9835-00182, issued July 10, 1998, Conditions D.1.8, D.1.9, D.1.10(b), and D.1.10(c), requiring monitoring, overspray observations, and daily visible emissions notations and record keeping for dry filters, are not applicable because the source has requested that such requirements be replaced by operator training requirements, as described in above Condition D.3.12(a).

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

D.3.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1(a), D.3.1(c), D.3.4 and D.3.6, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly, and shall be complete and sufficient to establish compliance with the HAP emission limits described in Conditions D.3.1(a), D.3.1(c) and D.3.6, and the VOC emission limit described in Condition D.3.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each FRP material and solvent used for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1 and FF-1; The VOC, single HAP, and

- total HAP content of each FRP material and solvent used for combined units F-34 and F-35.
- (2) Method of application and other emission reduction techniques for each resin and gelcoat used;
 - (3) The cleanup solvent usage for each month;
 - (4) The total HAP usage for each month for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1 and FF-1; the total VOC, single HAP, and total HAP usage for each month for combined units F-34 and F-35; and
 - (5) The weight of total HAP emitted for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1 and FF-1 for each compliance period; the weight of VOCs, single HAP and total HAP emitted for combined units F-34 and F-35 for each compliance period.
 - (6) The amount of resin and gel coat used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, 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 for cleanup solvents.
 - (7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with D.3.8 and D.3.12, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1(a), D.3.1(c), and D.3.4(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.15 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
 - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
 - (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information speci-

fied in 40 CFR 63.9(h), no later than May 21, 2007.

- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

- (b) The notifications required by paragraph (a) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management

Monaco Coach Corporation
Elkhart, Indiana
Permit Reviewer: A.Lee/B.J.Goldblatt/Lek R. Traivaranon

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Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Boiler

Customer Service Facilities - In-house Plants 7 & 9

- (k) A natural gas fired boiler, identified as B1, installed in 1963, with a maximum input capacity of 4.375 MMBtu/hour

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

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

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Woodworking, Sanding, Grinding, and Welding Units

Service Paint Area - In-house Plant 4

- (c) A body shop (3 bays, each performing a combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990, with a maximum capacity to prepare 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stack SV-12

In-house Plant 3

- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone dust collector to control particulate matter emissions, with a maximum capacity of 2.5 RVs per hour, exhausting to stack D-1

In-house Plant 6

- (g) A welding and metal painting area, identified as P6-6, constructed in 1990, with 30 welders, with a maximum capacity of 2.5 units per hour, with no emission control and exhausting to general building exhaust
- (h) A door manufacturing operation, identified as P6-29, constructed in 1990, consisting of three (3) welding stations, with a maximum capacity of 4.5 units/hour, with no emission control and exhausting to general building exhaust

Paint /Fiberglass Plant - In-house Plant 5

- (q) Two (2) closed loop grinding booths, identified as DC-FG1 and DC-FG2, constructed in 1998, each with a maximum capacity of parts to accommodate 4.5 recreational vehicles per hour, with dry filters to control particulate matter emissions, and exhausting to general building exhaust

Roadmaster Plant - In-house Plant 50

- (t) Seventy two (72) welding stations and ten (10) cutting tables, constructed in May 2000, with a combined maximum capacity of 4.5 chassis per hour, with no emission control

Aftermarket Fiberglass Plant - In-house Plant 8

- (w) A closed loop grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to general building exhaust

Insignificant Activities

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations

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

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

D.5.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices for these facilities.

D.5.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the body shop P4-12, shall not exceed 30.5 pounds per hour when operating at a process weight rate of 20 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking shop P3-1 shall not exceed 5.37 pounds per hour when operating at a process weight rate of 1.5 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grinding area DC-FG4 shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.9 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the closed loop units DC-FG1 and DC-FG2 shall not exceed 10.47 pounds per hour each when operating at a process weight rate of 4.05 tons per hour each.

The pounds per hour limitation was calculated with the following formula:

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

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

- (e) The requirements from CP 039-9835-00182, issued on July 10, 1998, Conditions D.3.1, D.3.4, D.3.5, D.3.6, D.3.7, D.3.8 and D.3.9, related to PM limits, monitoring, record keeping, and reporting for the closed loop grinding systems DC-FG1 and DC-FG2, are not applicable because there are no baghouses associated with the closed loop system, and due to

resolutions achieved through Cause No. 98-A-J-2075.

Compliance Determination Requirements

D.5.3 Particulate Matter (PM)

The dry filters and cyclone dust collector for PM control shall be in operation and control emissions from the body shop P4-12, woodworking shop P3-1, closed-loop grinding booths DC-FG1 and DC-FG2, and grinding area DC-FG4 at all times that the units are in operation.

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

D.5.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking shop P3-1 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Once per shift visible emission notations of the wood body shop P4-12 and closed-loop grinding booths DC-FG1 and DC-FG2 stacks' exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking shop P3-1 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.5.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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).

D.5.7 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program for the body shop P4-12.
 - (1) All operators that perform buff, FRP repair, paint prep, or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All

existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.

- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the visible emission notations of the body shop P4-12, woodworking shop P3-1, and the closed-loop grinding booths DC-FG1 and DC-FG2.
- (b) To document compliance with Condition D.5.5, the Permittee shall maintain records of the results of the inspections required and the dates the vents are redirected.
- (c) To document compliance with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

PSD Minor Limit Conditions for the entire source

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

D.6.1 PSD Minor Limit [326 IAC 2-2]

- (a) The total input of volatile organic compounds delivered to the applicators of surface coating units P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P6-6, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32 and R-33, including P3-2 and all adhesives and clean-up solvents, and total VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from fiberglass units P4-12, P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FF-1, FCB-1, GCB-1, F-34, and F-35, including adhesives and clean-up solvents, shall be limited to less than 245 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. This production limitation is equivalent to limiting the potential to emit volatile organic compounds to less than 245 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, will not apply.
- (b) Insignificant activities have been estimated to emit less than 5 tons of VOC/year.
- (c) The use of dry filters, cyclone dust collector, and closed loop grinding systems to meet Conditions D.1.3, D.2.2, D.3.3 and D.5.2 shall be required so that PTE PM/ PM₁₀ remains less than 250 tons/year and PSD is not applicable.
- (d) Any change or modification from the equipment covered in this permit, which may increase PM or VOC potential emissions to 250 tons per year, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.
- (d) The requirement from CP 039-4577-00182, issued on March 26, 1996, Condition 5, which limits the existing units to 249 tons of VOC per year such that PSD does not apply;

the requirement from CP 039-9835-00182, issued on July 10, 1998, which includes CP 039-9835-00182 equipment in the PSD limitation of 249 tons of VOC per year established in CP 039-4577-00182;

and the requirement from SSM 039-11468-00182, issued on May 3, 2000, which includes SSM 039-11468-00182 equipment in the PSD limitation of 249 tons of VOC per year established in CP 039-9835-00182;

are not applicable because they do not reflect equipment changes since March 26, 1996, and because the existing limit does not distinguish between Significant Emission Units and Insignificant Activities. Therefore, the PSD limitation established through the three previously issued permits will be superseded by new 326 IAC 2-2 limitations D.6.1(a) and (b) for the entire source.

Compliance Determination Requirements

D.6.2 VOC Emissions

Compliance with the VOC usage limitation contained in Condition D.6.1(a) 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 "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.

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

D.6.3 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1(a) the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and emission limit established in Condition D.6.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material, resin, gel coat and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (5) The cleanup solvent usage for each month;
 - (6) The total VOC coating usage for each month;
 - (7) The calculated total VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resin and gel coat use for each month.
 - (8) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Monaco Coach Corporation
Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T 039-7511-00182

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Monaco Coach Corporation
Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T 039-7511-00182

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) business hours (1-800-753-5519 or 219-245-4870, ask for Compliance Section); and
 The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 219-245-4877), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOX, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Combined facilities: Surface coating units P4-1, P4-7, P4-8, P4-8A, P4-37, P4-38, P6-28, P3-2, customer service facility, P5-10, P5-11, P5-5, P5-6, P5-9, FCB-1, P6-6, R-30, R-31, R-32 and R-33
 Fiberglass units P4-12, P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, FF-1, F-34, and F-35
 Adhesives and clean-up solvents
 Parameter: VOC input to surface coatings, adhesives, and solvents;
 VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resins and gel coats;
 PSD Limit: less than 245 tons VOC per 12 consecutive month period

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Combined facilities: Fiberglass units: P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, FF-1, FCB-1
 Parameter: Volatile HAP emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resins and gel coats;
 HAP input to adhesives and clean-up solvents
 MACT Limit: <100 tons of HAP per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Combined facilities: Fiberglass units F-34 and F-35
 Parameter: VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resins and gel coats;
 VOC input to adhesives and clean-up solvents;
 BACT Limit: < 25 tons VOC per 12 consecutive month period

YEAR:

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Facility: Surface coating, each: P4-37 and P4-38
 Parameter: VOC input to coatings and clean-up solvents
 BACT Limit: < 25 tons VOC per 12 consecutive month period

YEAR:

Paint Bay _____ (P4-37 or P4-38, submit one sheet for each bay)

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Combined facilities: Fiberglass units F-34 and F-35
 Parameter: Volatile HAP emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resins and gel coats;
 HAP input to adhesives and clean-up solvents;
 MACT Limit: < 25 tons of any combination of HAP per 12 consecutive month period
 < 10 tons of any single HAP per 12 consecutive month period

YEAR: _____

Combination of HAP:

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

Single highest emission HAP _____:

(name of HAP)

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182
 Facility: Surface coating booth, each: R-30, R-31, R-32, R-33
 Parameter: Volatile HAP input to coatings and clean-up solvents;
 MACT Limit: < 25 tons of any combination of HAP per 12 consecutive month period
 < 10 tons of any single HAP per 12 consecutive month period

YEAR: _____
 BOOTH: _____ (R-30, R-31, R-32, or R-33 ; submit one sheet for each booth)

Combination of HAP:

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

Single highest emission HAP _____:

(name of HAP)

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

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Monaco Coach Corporation
 Source Address: 2700 S. Nappanee Street, Elkhart, Indiana 46573
 Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
 Part 70 Permit No.: T 039-7511-00182

Months: _____ to _____ Year: _____

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attach UEF Table here

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Monaco Coach Corporation
Source Location: 2700 S. Nappanee Street, Elkhart, IN 46573
County: Elkhart
SIC Code: 3716, 3792
Operation Permit No.: T 039-7511-00182
Permit Reviewer: A. Lee/ B.J. Goldblatt/ E. Longenberger

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Monaco Coach Corporation relating to the operation of a towable and motorized recreational vehicle (RV) manufacturing plant.

Source Definition

This recreational vehicle manufacturing plant consists of several in-house plants which are located within the same city block bordered by Mishawaka Rd., S. Nappanee Street, and W. Hively :

- (a) Plant 3 is located at 1722 Mishawaka Road;
- (b) Plants 8 and 50 are located at 2700 S. Nappanee Street; and
- (c) Plants 4, 5, 6, 7, and 9 are located at 1809 W. Hively.

Since the in-house plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The source has requested that the main source location be identified as 2700 S. Nappanee Street.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Service Paint Area - Plant 4

- (a) A surface coating booth, identified as P4-1, constructed in 1990, equipped with an air assisted airless spray applicator and an airless spray applicator; maximum capacity to coat metal or fiberglass reinforced plastic (FRP) recreational vehicles (RVs) increased from 0.676 RVs per hour in 1996 to 2.0 RVs per hour to date; using dry filters to control particulate matter, and exhausting to stack SV-1; the unit can also perform minor "patch" FRP repair
- (b) Three (3) surface coating repair booths, identified as P4-7, P4-8, and P4-8A, constructed in 1990, each equipped with air atomized spray applicators; for each booth, maximum capacity to coat metal or fiberglass reinforced plastic (FRP) coaches increased from 0.676 RVs per hour in 1996 to 1.0 RV per hour to date; using dry filters to control particulate matter, and

exhausting to stacks SV-7, SV-8, and SV-8A; the units can also perform minor "patch" FRP repair

- (c) A body shop (3 bays, each performing combination of buff, FRP repair, and paint prep), identified as P4-12, constructed in 1990; maximum capacity to prepare RVs increased from 0.676 RVs per hour in 1996 to 1.0 RV per hour to date; using dry filters to control particulate matter, and exhausting to stack SV-12
- (d) Two (2) paint bays, identified as P4-37 and P4-38, constructed in December 2000, each with a maximum capacity to coat 1.0 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-37 and SV-38; the units can also perform minor "patch" FRP repair

Plant 3

- (e) A towable assembly area, which includes caulks, adhesives, paints and solvents, identified as P3-2, constructed in 1990, with an increase in maximum capacity from 0.476 RVs per hour in 1996 to 2.5 RVs per hour to date, with no emission control and exhausting to general building exhaust
- (f) A woodworking shop, identified as P3-1, constructed in 1990, and consisting of five (5) table saws, two (2) chop saws, two (2) belt sanders, a pocket groove machine, three (3) radial arm saws, two (2) band saws, a drill machine, and a pin router, using a cyclone dust collector to control particulate matter emissions, with an increase in maximum capacity from 0.476 RVs per hour in 1996 to 2.5 RVs per hour to date, exhausting to stack D-1

Plant 6

- (g) A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, with an increase in maximum capacity from 0.2 units per hour in 1996 to 2.5 units per hour to date, with no emission control and exhausting to general building exhaust; the area was included in permit CP 039-4577-00182, issued March 26, 1996, as part of the chassis manufacturing facility
- (h) A door manufacturing operation, identified as P6-29, constructed in 1990, consisting of three (3) welding stations, with an increase in maximum capacity from 0.2 units per hour in 1996 to 4.5 units/hour to date, with no emission control and exhausting to general building exhaust; the operation was included in permit CP 039-4577-00182, issued March 26, 1996, as part of the chassis manufacturing facility
- (i) A paint booth for metal doors, identified as P6-28, constructed in 1997, with an increase in maximum capacity from 0.9 doors/hour in 1998 to 4.5 units per hour to date, using filtered exhaust as particulate control and exhausting to stack SV-28

Customer Service Facilities - Plants 7 & 9

- (j) A customer service facility, constructed in 1990, with miscellaneous caulks, sealants, touch-up metal surface coating and solvent emissions, with no emission control, and exhausting to general building exhaust; maximum capacity increased from 0.5 RVs per hour in 1996 to 2.25 RV's per hour, as described in SSM 039-11468-00182, issued May 3, 2000
- (k) A natural gas fired boiler, identified as B1, installed in 1963, with a maximum input capacity of 4.375 MMBtu/hour

Paint /Fiberglass Plant - Plant 5

- (l) A fiberglass mold prep and clean-up operation, identified as P5-1, constructed in 1998, with a maximum capacity of parts which can accommodate 4.5 RVs per hour, with no emission control and exhausting to general building exhaust
- (m) A fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and four (4) resin application stations, identified as FB-1, FB-2, FB-3, and FB-4, constructed in 1998, each with a maximum capacity of parts which can accommodate 4.5 RVs per hour, using dry filters to control particulate matter and exhausting to stacks SV-13, SV-14, SV-15, SV-16, SV-19, SV-20, SV-24, SV-25 and SV-26
- (n) A fiberglass closed tooling operation, identified as CT-1, constructed in 1998, with a maximum capacity to build parts for 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18
- (o) A fiberglass cure booth, identified as FCB-1, and a gelcoat cure booth, identified as GCB-1, constructed in 1998, each with a maximum capacity to cure parts which will accommodate 4.5 RVs per hour, with no emission control, and exhausting to stacks SV-21, SV-22, SV-26, and SV-27
- (p) One (1) fiberglass final finish area, identified as FF-1, constructed in 1998, with a maximum capacity of parts which will accommodate 4.5 RVs per hour, with no emission control and exhausting to stacks SV-17 and SV-18
- (q) Two (2) closed loop grinding booths, identified as DC-FG1 and DC-FG2, constructed in 1998, each with a maximum capacity of parts to accommodate 4.5 RVs per hour, with dry filters to control particulate matter emissions, and exhausting to general building exhaust
- (r) Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, each with a maximum capacity of metal parts to produce 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and exhausting to stacks SV-5, SV-6, and SV-9
- (s) Two (2) surface coating booths, identified as P5-10 and P5-11, constructed in 1990, and permitted by SSM 039-11468-00182, issued May 3, 2000, as two units with a combined maximum production capacity of small metal parts to produce 4.0 RVs per hour, using dry filters to control particulate matter, and exhausting to stacks SV-10 and SV-11

Roadmaster Plant - Plant 8

- (t) Seventy two (72) welding stations and ten (10) cutting tables, constructed in May 2000, with a combined maximum capacity of 4.5 chassis per hour, with no emission control

Note: SSM 039-11468-00182, issued May 3, 2000, describes the welding and cutting stations as an existing unit with an increase in production from 0.676 to 4.5 chassis per hour. The description was incorrect, as these units exist in the former Bull Moose plant, which was recently acquired by the source. Prior to the issuance of SSM 039-11468-00182, these stations did not exist as one of the source's units.

- (u) Four (4) surface coating booths, identified as R-30, R-31, R-32, and R-33, constructed in May 2000, each with a maximum capacity of 4.5 metal chassis per hour, using dry filters to control particulate matter, and exhausting to stacks SV-30, SV-31, SV-32, and SV-33

Aftermarket Fiberglass Plant - Plant 50

- (v) Two (2) fiberglass production areas, identified as F-34 and F-35, constructed in September 2000, with a combined maximum capacity of parts to produce 1 RV per hour, using dry filters to control particulate matter, and exhausting to stacks SV-34 and SV-35
- (w) A grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to stack SV-4

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

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

- (a) Natural gas-fired space heaters, process heaters, or boilers with heat input equal to or less than ten million Btu (10MMBtu) per hour
 - (1) Seventeen (17) infrared natural gas-fired space heaters, each with a maximum heat input rate of 0.100 million British thermal units per hour
 - (2) Eight (8) infrared natural gas-fired space heaters, each with a maximum heat input rate of 0.170 million British thermal units per hour
 - (3) Nine (9) natural gas-fired radiant heaters, each with a maximum heat input rate of 0.100 million British thermal units per hour
 - (4) Seven (7) natural gas-fired radiant heaters, each with a maximum heat input rate of 0.150 million British thermal units per hour
 - (5) Two (2) natural gas-fired radiant heaters, each with a maximum heat input rate of 0.125 million British thermal units per hour
 - (6) Two (2) natural gas-fired radiant heaters, each with a maximum heat input rate of 0.080 million British thermal units per hour
 - (7) One (1) natural gas-fired forced air heater with a maximum heat input rate of 0.300 million British thermal units per hour
 - (8) One (1) natural gas-fired forced air heater with a maximum heat input rate of 0.200 million British thermal units per hour
 - (9) One (1) natural gas-fired forced air heater with a maximum heat input rate of 0.150 million British thermal units per hour
 - (10) One (1) natural gas-fired forced air heater with a maximum heat input rate of 0.060 million British thermal units per hour

- (11) Seven (7) natural gas-fired forced air heaters with a maximum heat input rate of 0.096 million British thermal units per hour
- (12) One (1) natural gas-fired forced air heater with a maximum heat input rate of 0.179 million British thermal units per hour
- (b) Three (3) natural gas-fired air make-up units, each with a maximum heat input rate of 0.990 million British thermal units per hour
- (c) One (1) natural gas-fired air make-up unit, with a maximum heat input rate of 2.00 million British thermal units per hour
- (d) One (1) natural gas-fired air make-up unit, with a maximum heat input rate of 3.80 million British thermal units per hour
- (e) One (1) natural gas-fired air make-up unit, with a maximum heat input rate of 6.00 million British thermal units per hour
- (f) One (1) natural gas-fired air make-up unit, with a maximum heat input rate of 2.384 million British thermal units per hour.
- (g) One (1) natural gas-fired air make-up unit, with a maximum heat input rate of 3.287 million British thermal units per hour
- (h) Two (2) air make-up units, identified as AMU-6 and AMU-8, each with a maximum heat input rate of 1.0 million British thermal units per hour
- (i) Two (2) air make-up units, identified as AMU-9 and AMU-10, each with a maximum heat input rate of 4.0 million British thermal units per hour
- (j) Propane or liquified petroleum gas, or butane-fired space heaters, process heaters, or boilers with heat input equal to or less than 6 MMBtu per hour
- (k) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons
- (l) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month
- (m) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids
- (n) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings
- (o) Machining where an aqueous cutting coolant continuously floods the machining interface
- (p) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: cold cleaner degreasers with remote solvent reservoirs [326 IAC 8-3-2]

- (q) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C, or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C;the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months
- (r) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment
- (s) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
 - (2) Using 80 tons or less of welding consumables
- (t) Groundwater oil recovery wells
- (u) Solvent recycling systems with batch capacity less than or equal to 100 gallons
- (v) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume
- (w) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility
- (x) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs
- (y) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
- (z) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [negligible PM emissions]
- (aa) Paved and unpaved roads and parking lots with public access
- (bb) On-site fire and emergency response training approved by the department
- (cc) Gasoline generators not exceeding 110 horsepower
- (dd) Diesel generators not exceeding 1600 horsepower
- (ee) Stationary fire pumps
- (ff) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting;

pneumatic conveying; and woodworking operations [326 IAC 6-3-2]

- (gg) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C)
- (hh) Certain service repair activities which emit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP
- (ii) Certain service repair activities which emit greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs

Existing Approvals

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

Source Modification # SSM 039-11468-00182, issued on May 3, 2000

Construction Permit # 039-9835-00182, issued on July 10, 1998

Construction Permit # 039-4577-00182, issued on March 26, 1996

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) Source Modification # 039-11468-00182, issued May 3, 2000 and Construction Permit # 039-9835-00182, issued on July 10, 1998 and Construction Permit # 039-4577-00182, issued on March 26, 1996

Some of the emission units and pollution control equipment included in the three permits will be described differently or will not be incorporated in this proposed Part 70 Permit, because they have been modified or eliminated from the source, or were erroneously described in a previous permit. Equipment lists from previously issued permits will be replaced by section A.2 Emission Units and Pollution Control Equipment Summary in this proposed Part 70 permit and by the Insignificant Activities list in this TSD for the proposed Part 70 permit.

Likewise, all permit conditions which were applicable for modified or eliminated facilities have been modified or eliminated to reflect conditions that are applicable for current emission units and pollution control equipment in this proposed Part 70 Permit.

- (b) Construction Permit CP 039-4577-00182, issued on March 26, 1996

Condition #5: 326 IAC 2-2 (PSD), which limits the existing units to 249 tons per year such that PSD does not apply.

and

Construction Permit # 039-9835-00182, issued on July 10, 1998

Condition D.2.1(b), which includes CP 039-9835-00182 equipment in the PSD limitation of 249 tons per year established in CP 039-4577-00182

and

Source Modification # SSM 039-11468-00182, issued on May 3, 2000

Condition D.3.1(b), which includes SSM 039-11468-00182 equipment in the PSD limitation

of 249 tons per year established in CP 039-9835-00182

The above conditions will not be incorporated in this proposed Part 70 permit because they have been replaced with conditions reflecting equipment changes since March 26, 1996. Also, the existing limit does not distinguish between Significant Emission Units and Insignificant Activities. Therefore, the PSD limitation established through the three previously issued permits will be superseded by new 326 IAC 2-2 limitations for the entire source, which will include a VOC usage/emission limit of 245 tons/year for all significant emission units and an estimation of VOC emissions < 5 tons/year for Insignificant Activities.

- (c) CP-039-9835-00182, issued July 10, 1998 *and* CP 039-4577-00182, issued on March 26, 1996

Condition C.11(a) and (b) (Emission Statement [326 IAC 2-6]) from CP-039-9835-00182 will be replaced in this proposed Part 70 Permit by similar Condition C.15(a) (Emission Statement), due to the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075. The resolution is also applicable to Condition #8 from CP 039-4577-00182, which will be replaced in this Part 70 Permit by Condition C.15(a).

- (d) CP-039-9835-00182, issued July 10, 1998 *and* SSM 039-11468-00182, issued May 3, 2000

- (1) Conditions D.1.4 and D.4.3, (Preventive Maintenance Plan) from CP-039-9835-00182 will be changed in this proposed Part 70 permit due to the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075, so that PMPs will not be required for the facilities, but will be required for only the control devices of the facilities.

The resolution is also applicable to Conditions D.1.5 and D.2.2 from SSM 039-11468-00182, which will be replaced in the Proposed Part 70 Permit by PMP requirements for control devices of the facilities.

- (2) Conditions D.1.10(a)(2), D.2.3(a)(2) and D.4.8(a)(2) from CP-039-9835-00182, which describe the need to keep logs of the dates of VOC use, will not be incorporated in this Proposed Part 70 permit, due to the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075.

The resolution is also applicable to Condition D.1.11(a)(2) from SSM 039-11468-00182, which will not be incorporated in this Proposed Part 70 Permit

- (e) CP-039-9835-00182, issued July 10, 1998

- (1) Condition D.1.2, MACT conditions, will be replaced in this proposed Part 70 permit by similar MACT conditions which differ, in part, by providing special monomer content limits for tooling operations and describing different styrene emissions calculation methods, as determined through the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075.

- (2) Conditions D.1.8, D.1.9, D.1.10(b), D.1.10(c), D.4.6, D.4.7, and D.4.8(b), which describe monitoring, overspray observations, daily visible emissions notations and record keeping requirements for dry filters, will not be incorporated in this proposed Part 70 permit, because the source has requested through the appeal to CP-039-9835-00182, Cause No. 98-A-J-2075, that they be replaced by operator training program requirements.

- (3) Conditions D.3.1, D.3.5, D.3.6, D.3.7, D.3.8 and D.3.9, related to PM limits, monitoring, record keeping, and reporting for the closed loop grinding systems DC-FG1 and

DC-FG2, will not be incorporated in this proposed Part 70 permit because there are no baghouses associated with the closed loop systems and resolutions to the source's appeal to CP-039-9835-00182, Cause No. 98-A-J-2075, allow for the 1.53 lb PM/hr limit to be changed to an unspecified limit which complies with 326 IAC 6-3-2 process weight rate limitations accomplished through the formula:

$$E = 4.10 P^{0.11} - 40$$

and allow monitoring, record keeping, and reporting requirements to be eliminated.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional application information was received on November 11, 1999, December 21, 1999, December 27, 1999, July 21, 2000, August 2, 2000, August 25, 2000 and August 28, 2000.

Emission Calculations

See the Appendix of this document for some detailed emissions calculations. Other calculations submitted by the applicant and/or detailed in previously issued permits have been verified and found to be accurate and correct.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
styrene	greater than 10
hexane	greater than 10
toluene	greater than 10
xylene	greater than 10
ethyl benzene	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) PM₁₀ and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) any single HAP is equal to or greater than ten (10) tons per year, and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	4
SO ₂	not reported
VOC	71
CO	not reported
NO _x	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	any Single HAP	HAP Combination
combined units F-34 & F-35	N.C.	N.C.	-	< 25	-	-	< 10	< 25
each unit R-30, R-31, R-32, R-33	6.95	6.95	-	164	-	-	< 10	< 25
combined units P5-1, P5-5, P5-6, P5-9, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, and Final Finish	N.C.	N.C.	-	N.C.	-	-	N.C.	< 100
natural gas combustion, total MMBtu/hr = 61.0	2.0	2.0	0.2	1.5	22.4	26.7	N.C.	N.C.
sawing, sanding, grinding, welding, etc., combined	166	166	-	-	-	-	N.C.	N.C.
each unit P4-37 and P4-38	0.28	0.28	-	< 25	-	-	5.16	11.02
combined significant emission units, limited total	N.C.	N.C.	N.C.	245	N.C.	N.C.	N.C.	N.C.
Entire Source	N.C.	N.C.	N.C.	< 250 *	N.C.	N.C.	N.C.	N.C.

"-" = estimated to be minimal

* Insignificant Activities are estimated to emit < 5 tons of VOC/year

N.C. = not calculated

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 Operating Permit does involve pollutant-specific emissions units as defined in 40 CFR 64.1 for PM/PM₁₀ (R-30, R-31, R-32 and R-33):
- (1) with the potential to emit before controls equal to or greater than the major source threshold for PM/PM₁₀;
 - (2) that are subject to an emission limitation or standard for PM/PM₁₀ (326 IAC 6-3); and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to R-30, R-31, R-32 and R-33. The Permittee submitted their complete Part 70 permit application by April 20, 1998, therefore, the source must submit a CAM plan for PM/PM₁₀ as part of their Part 70 renewal application. No CAM plan is required for VOC since units R-30, R-31, R-32 and R-33 do not use a control device for VOC. No other units at this source have the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutant.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (1) Natural gas-fired boiler B1 is not subject to the requirements of NSPS Subpart Db (Industrial-Commercial-Institutional Steam Generating Units) due, in part, to construction prior to June 19, 1984.
 - (2) Natural gas-fired boiler B1 is not subject to the requirements of NSPS Subpart Dc (Small Industrial-Commercial-Institutional Steam Generating Units) due, in part, to construction prior to June 9, 1989.
- (c) The insignificant degreasers are not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAPs)(326 IAC 14) 40 CFR Part 63, Subpart T, because they do not use solvents containing halogenated HAP in a total concentration greater than 5 percent (5%) by weight.

- (d) The metal surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart M MMM. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart M MMM for Surface Coating of Miscellaneous Metal Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>, and will be published in the *Federal Register*.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart M MMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart M MMM, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart M MMM.
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

- (e) The plastic parts surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart P PPP. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart P PPP, for Surface Coating of Plastic Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>, and will be published in the *Federal Register*.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart P PPP.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart P PPP, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 days after the effective date of 40 CFR 63, Subpart P PPP.
- (2) A Notification of Compliance Status containing the information required by 40 CFR

63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source.

- (f) The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart WWWW.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification on or before July 21, 2005, which is nine (9) months prior to the compliance date for the MACT (April 21, 2006). The application will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on November 11, 1999. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a potential major source due to its unlimited potential to emit 250 or more tons per year of PM, PM₁₀ and VOC.

- (a) The total input of VOC delivered to the applicators of surface coating units P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P6-6, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32 and R-33, including P3-2 and all adhesives and clean-up solvents, and total VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from fiberglass units P4-12, P5-1, P5-5, P5-6, P5-9, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FF-1, FCB-1, GCB-1, F-34, and F-35, including adhesives and clean-up solvents, shall be limited to less than a total of 245 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. This production limitation is equivalent to limiting the potential to emit VOC from the significant emission units to less than 245 tons per year.

The insignificant activities, combined, have been estimated to emit less than five (5) tons of VOC per year. The potential to emit of VOC from all significant emission units, combined, will be limited to less than 245 tons of VOC per year. Therefore, the potential to emit of VOC from the entire source is limited to less than two-hundred fifty (250) tons per year, and the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, will not apply.

- (b) Any change or modification which may increase potential VOC emissions to 250 tons per year or more, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.
- (c) Dry filters, dust collectors, and closed loop grinding systems shall be in operation at all times the body shop P4-12, woodworking shop P3-1, closed-loop grinding booths DC-FG1 and DC-FG2, grinding area DC-FG-4, insignificant sanding/grinding activities, and surface coating operations are in operation, so that the potential to emit of PM/ PM₁₀ remains less than two-hundred fifty (250) tons per year, which renders the requirements of 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-4.1-1 (New source toxics control)

This source contains units which are major sources of HAP as defined in 326 IAC 2-4.1-1, due to their potential to emit a single HAP at a level greater than ten (10) tons per year and any combination of HAP at a level greater than twenty-five (25) tons per year, and which were constructed after July 27, 1997, which is the applicability date of this rule.

- (a) Pursuant to SSM 039-11468-00182, issued May 3, 2000, emissions from Aftermarket Fiberglass units F-34 and F-35 shall be limited to less than a total of ten (10) tons per twelve (12) consecutive month period for any single HAP, and less than a total of twenty-five (25) tons per twelve (12) consecutive month period of a combination of HAPs. Compliance with these limits shall be determined at the end of each month. Thus, the requirements of 326 IAC 2-4.1 are not applicable.
- (b) The following MACT conditions shall replace similar MACT conditions required pursuant CP-

039-9835-00182, issued July 10, 1998, for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, and FF-1, as determined through the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075. The following MACT conditions will also apply to P5-5, P5-6, and P5-9 when they are converted from surface coating to fiberglass production.

- (1) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 - (A) Monthly usage by weight, weight percent content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors used shall be approved by IDEM, OAQ.
 - (B) The emission factors approved for use by IDEM, OAQ are taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	45
Production Resin, Manual or Mechanical Application, - - Noncorrosion Resistant Filled (\$35% by weight)	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents

higher than those specified in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

Where:	$Em_A \leq (M_R * E_{Ra}) + (M_G * E_{Ga})$
	M_R = Total monthly mass of resins within each resin category
	M_G = Total monthly mass of gel coats within each gel coats category
	E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
	E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
	Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls
	<i>Units: mass = tons emission factor = lbs of monomer per ton of resin or gel coat emissions = lbs of monomer</i>

- (3) Non-atomized spray application technology shall be used in all unfilled production resins.

Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement process (FIP), resin impregnators, or other non-spray applications of a design and specifications approved by IDEM, OAQ. IDEM, OAQ approval of non-atomized spray application technologies is not required if the Permittee uses one or more of the non-atomized spray technologies identified above.

If after one year of operation it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques approved by IDEM, OAQ. Examples of other emission reduction techniques that are approved include lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. The emission reductions from use of vapor suppression and vacuum bagging/bonding must be determined and approved by IDEM, OAQ prior to use. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (4) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that 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.

- (5) The following listed work practices shall be implemented:
 - (A) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup.
 - (B) For VOC- and/or HAP-containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work areas.
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be completely closed when not in use.
 - (iii) Solvent-saturated cleanup rags shall be stored, transported, and discarded in containers that are tightly closed.
 - (iv) Spray guns shall be designed to be cleaned without needing to spray solvent into the air.
 - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (C) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.
- (c) Pursuant to SSM 039-11468-00182, issued on May 3, 2000, and modified through the Part 70 Operating Permit, the surface coating booths R-30, R-31, R-32, and R-33, each constructed in May 2000, shall each be limited to less than ten (10) tons of any single input HAP and less than twenty-five (25) tons of input HAP combination per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this these limits renders the requirements of 326 IAC 2-4.1 not applicable.
- (d) Surface coating booth P4-1, constructed in 1990, and recently modified to increase production from 0.676 units/hour to 2.0 units/hour, with a potential to emit greater than ten (10) tons of xylene and toluene per year, is not subject to 326 IAC 2-4.1, because the modification does not qualify as a reconstruction of the unit.
- (e) As shown in the Appendix A of the TSD of SSM 039-11468-00182, issued May 3, 2000, the seventy-two (72) welding stations and ten (10) cutting stations within Roadmaster Plant 8, have the potential to emit 15.42 tons of manganese per year. None of the production lines within the welding/cutting stations have the potential to emit ten (10) tons of manganese per year, therefore, the requirements of 326 IAC 2-4.1 are not applicable to any part of the welding/cutting facility.
- (f) The towable assembly area (P3-1) does not contain any single facility with the potential to emit ten (10) tons per year of a single HAP, or twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to any facility at P3-1.
- (g) The customer service facility within in-house plants 7 and 9 does not contain any single facility with the potential to emit ten (10) tons per year of a single HAP, or twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are

not applicable to any facility at the customer service facility.

- (h) In-house Plant 6 emission units P6-6 and P6-28 do not contain any single facility with the potential to emit ten (10) tons per year of a single HAP, or twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to any facility at Plant 6.
- (i) Emission units P4-7, P4-8, P4-8A, P4-37, P4-38, P4-12, P3-2 and P6-29 were constructed prior to July 27, 1997, therefore, the requirements of 326 IAC 2-4.1 do not apply to these facilities.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC and more than one hundred (100) tons per year of PM₁₀. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This source is subject to the requirements of 326 IAC 20-25 because it has the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPS, and meets all of the following criteria:

- (a) The source manufactures reinforced plastics composites parts, products, or watercraft.
- (b) The source includes an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.
- (c) The source has actual emissions of styrene equal to or greater than three (3) tons per year.

Pursuant to 326 IAC 20-25-3(e), the requirements of 326 IAC 20-25-3 apply only to those facilities which are not subject to the requirements of 326 IAC 2-4.1. Therefore, only the two (2) fiberglass production areas, identified as F-34 and F-35, are subject to the requirements of 326 IAC 20-25-3 (Emission Standards). However, all fiberglass production units at the source are subject to the requirements of 326 IAC 20-25-4 (Work practice standards), 326 IAC 20-25-6 (Record keeping requirements), 326 IAC 20-25-7 (Reporting requirements), and 326 IAC 20-25-8 (Operator training).

- (a) Pursuant to 326 IAC 20-25-3, resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following tables, or their equivalent, on an emissions

mass basis, depending on the application method and products produced:

TABLE I Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke Shrinkage Controlled	60*
Tooling	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

TABLE II Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

*Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(a) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer

content resins and gel coats, vapor suppression, vacuum bagging, controlled spray (if approved by OAQ) or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
- (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPS.
 - (B) All production and tooling gel coats that contain HAPS.
 - (C) Waste resins and gel coats that contain HAPS.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPS.
 - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (e) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
- (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

- (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (f) Pursuant to 326 IAC 20-25-3(d), the following cleaning operations for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPS. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas-fired boiler (B1), constructed in 1963 and rated at 4.375 million British thermal units per hour is subject to the requirements of 326 IAC 6-2-3. Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units of heat input, or a limit established by the following method, whichever is less:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \quad Pt = \text{lbs of particulate emitted per MMBtu heat input}$$

Where:

- C = Maximum ground level concentration = 50 Fg/m³
- a = Plume rise factor = 0.67
- H = Stack height in feet = 26
- Q = Total source permitted capacity in MMBtu/hr = 4.375 MMBtu/hr
- N = Number of stacks = 1

$$Pt = \frac{50 \text{ ug/m}^3 * 0.67 * 26}{76.5 * 4.375^{0.75} * 1^{0.25}}$$

$$Pt = 3.76 \text{ pounds per million British thermal units}$$

Therefore, the boiler shall be limited to 0.8 rather than 3.76 pounds of particulate matter per million British thermal units of heat input.

Based on Appendix A, the worst-case potential particulate emission rate is:

$$0.036 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.0082 \text{ lb/hr}$$
$$(0.0082 \text{ lb/hr} / 4.375 \text{ mmBtu/hr}) = 0.0019 \text{ lb particulate per mmBtu}$$

The particulate emissions from the one (1) natural gas-fired boiler (B1) are 0.0019 pounds per million British thermal units, which is less than the allowable emission rate of 0.8 pounds per million British thermal units. Therefore, the one (1) natural gas-fired boiler (B1) is in compliance with this rule.

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

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the allowable PM emission rate from surface coating operations P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P6-28, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32 and R-33, and FRP production units GB-1, FB-1, FB-2, FB-3, FB-4, P5-5, P5-6, P5-9, F-34, and F-35 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be

accomplished by use of the equation:

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

Under the rule revision, particulate from the surface coating and reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Any change or modification at either P3-2 or the customer service facility which would increase the coating application rate to greater than five (5) gallons per day, shall require prior IDEM, OAQ approval.
- (c) Pursuant to 326 IAC 6-3-1(b)(9), the welding operations P6-6, P6-29, and the Plant 8 welding operations are exempt from the requirements of 326 IAC 6-3-2, because the welding operations each consume less than 625 pounds of rod or wire per day. Any change or modification at any welding operation which would increase the consumable usage to 625 pounds of rod or wire per day or more, shall require prior IDEM, OAQ approval.
- (d) Pursuant to 326 IAC 6-3-1(b)(10), Plant 8 cutting operations are exempt from the requirements of 326 IAC 6-3-2, because less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut. Any change or modification at the Plant 8 cutting operations which would increase the cutting rate to more than 3,400 inches per hour, shall require prior IDEM, OAQ approval.
- (e) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the non-surface coating processes in the body shop (P4-12), the woodworking shop (P3-1), closed-loop grinding booths DC-FG1 and DC-FG2, grinding area DC-FG4, shall be limited by the following:

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

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

Therefore:

- (1) the allowable particulate emission rate from P4-12 shall not exceed 30.5 pounds per hour when operating at a process weight rate of 20 tons per hour.
- (2) the allowable particulate emission rate from P3-1 shall not exceed 5.37 pounds per hour when operating at a process weight rate of 1.5 tons per hour.
- (3) the allowable particulate emission rate from DC-FG4 shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.9 tons per hour.
- (4) the allowable particulate emission rate from DC-FG1 & 2 shall each not exceed 10.47 pounds per hour when operating at a process weight rate of 4.05 tons per hour, each.

The dry filters, closed loop grinding system, and cyclone dust collectors shall be in operation at all times that the body shop, woodworking shops, and grinding booths are in operation, in order to comply with 326 IAC 6-3. The use of filters, closed loop grinding system, and

cyclones are also required so that PM emissions will remain less than two-hundred fifty (250) tons per year, and render the requirements of 326 IAC 2-2 not applicable.

326 IAC 8-1-6 (New facilities, general reduction requirement)

- (a) Pursuant to 326 IAC 8-1-6 and CP No. 039-4577-00182, issued on March 26, 1996, the units P4-1, P4-7, P4-8, P4-8A, and P4-12 shall comply with 326 IAC 8-1-6, which requires use of Best Available Control Technology (BACT). BACT for these units has been determined to be the use of hand wiped and air atomization spray coating application methods. These application methods shall be used at all times that the FRP surface coating emission units are operated. This shall satisfy the requirements of 326 IAC 8-1-6.
- (b) Pursuant to 326 IAC 8-1-6, fiberglass units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, FF-1, P5-5, P5-6, and P5-9 require the use of BACT. Pursuant to CP-039-9835-00182, issued July 10, 1998, BACT for the FRP units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, FF-1, shall be satisfied by the MACT requirements of 326 IAC 2-4.1-1 (New source toxics control) specified in this proposed Part 70 permit. BACT for units P5-5, P5-6, and P5-9 shall also be satisfied by the MACT requirements of 326 IAC 2-4.1-1 (New source toxics control) specified in this proposed Part 70 permit.
- (c) Pursuant to SSM 039-11468-00182, issued May 3, 2000, the total VOC delivered to F-34 and F-35 shall be limited less than a total of twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to F-34 and F-35.
- (d) Paint bays P4-37 and P4-38, each with an unlimited potential to emit VOC greater than twenty-five (25) tons per year, are each limited to less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, when coating fiberglass or plastic substrates. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to P4-37 or P4-38.
- (e) The towable assembly area P3-1 does not contain any single facility with the potential to emit twenty-five (25) tons of VOC per year, therefore, the requirements of 326 IAC 8-1-6 are not applicable for any facility at P3-1.
- (f) The customer service facility within in-house plants 7 and 9 does not contain any single facility with the potential to emit twenty-five (25) tons of VOC per year, therefore, the requirements of 326 IAC 8-1-6 are not applicable for any facility at the customer service facility.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere volatile organic compound (VOC) from the application equipment of spray booths/areas P4-1, P4-7, P4-8, P4-8A, P4-37, P4-38, P3-2, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32, and R-33 in excess of 3.5 pounds of VOC per gallon of coating less water for non-clear, air dried, forced warm air dried or extreme performance coatings, and 4.3 pounds of VOC per gallon of coating less water for clear coatings, excluding water, as delivered to the applicator.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from application equipment of spray booths/areas P4-1, P4-7, P4-8, P4-8A, P4-37, P4-38, P3-2, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32, and R-33 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the surface coating operations are in compliance with this requirement.

326 IAC 8-6 (Organic Solvent Emission Limitations)

None of the facilities at this source are subject to 326 IAC 8-6, because they were constructed following the applicable period of October 7, 1974 through December 31, 1979.

State Rule Applicability - Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)

The insignificant cold cleaner degreasers with remote solvent reservoirs are subject to the requirements of 326 IAC 8-3-2. Pursuant to this rule, the Permittee shall:

- (a) Equip the cleaners with a cover;
- (b) Equip the cleaners with a facility for draining cleaned parts;
- (c) Close the degreaser covers whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and do not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-1, the insignificant degreasers with remote solvent reservoirs are not subject to 326 IAC 8-3-5 due to their remote solvent reservoir components.

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

The insignificant cold cleaner degreasers are not subject to 326 IAC 20-6-1 because they do not use solvents containing halogenated HAP in a total concentration greater than 5 percent by weight.

Testing Requirements

There are no testing requirements included in this Part 70 Operating Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds

for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 monitoring requirements applicable to this source are as follows:

Body shop P4-12, woodworking shop P3-1, and the closed-loop grinding booths DC-FG1 and DC-FG2 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the woodworking shop P3-1 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Once per shift visible emission notations of the wood body shop P4-12 and closed-loop grinding booths DC-FG1 and DC-FG2 stacks' exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (g) An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking shop P3-1 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
- (h) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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).
- (i) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this towable and motorized recreational vehicle (RV) manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-7511-00182**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name:	Monaco Coach Corporation
Source Location:	2700 S. Nappanee Street, Elkhart, IN 46573
County:	Elkhart
SIC Code:	3716, 3792
Operation Permit No.:	T 039-7511-00182
Permit Reviewer:	A. Lee/ B.J. Goldblatt/ E. Longenberger

On December 22, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth in Elkhart, Indiana, stating that Monaco Coach Corporation had applied for a Part 70 Operating Permit to operate a towable and motorized recreational vehicle (RV) manufacturing plant with control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On January 21, 2004, Kurt W. Anderson of Monaco Coach Corporation submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

In Section A.1 of the permit, the area code for the phone number has changed to (574). The correct phone number is 574-862-7347

Response 1:

The telephone number in Condition A.1 has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary towable and motorized recreational vehicle manufacturing plant.

Responsible Official:	Richard E. Bond, Chief Administrative Officer
Source Address:	2700 S. Nappanee Street, Elkhart, Indiana 46573
Mailing Address:	P.O. Box 465, Wakarusa, Indiana 46573
Phone Number:	574 249-862-7574
SIC Code:	3716, 3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

Comment 2:

Condition A.3(e), Plant 3, page 7 of 73: Plant 3 completed an expansion in 2003 (Notice only). Part of this expansion included higher production capacities but all of the assembly operations are insignificant or de minimus and should not be subject to any production limits. Condition A.3(e) should be changed to state:

- (e) A towable assembly area, which **uses hand applied** caulks, adhesives, paints and solvents identified as P3-2, constructed in 1990 **and expanded in 2003**, ~~with a maximum capacity of 2.5 RV's per hour~~, with no emission control and exhausting to general building exhaust.

Response 2:

The maximum capacities listed in the emission unit descriptions in Sections A.1 through A.3 are used by IDEM, OAQ to form a more complete description of the facilities, and to assess the source's potential to emit. The process specific emissions limitations identified in the D Sections of the permit are often determined from this information. Physical changes or changes in the method of operation that change the capacity of a facility may also increase the emission unit's potential to emit. Documenting the capacity will assist both the Permittee and the IDEM, OAQ in evaluating whether such a change requires a preconstruction permit or other approval. Therefore, the capacity cannot be removed from the facility description.

IDEM, OAQ is aware of the 2003 expansion. In order to document those changes, this Part 70 permit will be amended through approval 039-17154-00182.

Comment 3:

Condition A.3(f), Plant 3, page 7 of 73: Plant 3 completed an expansion in 2003 (Notice only). Part of this expansion included a new baghouse for the woodworking shop and higher production. Condition A.3(f) should be changed to state:

- (f) A woodworking shop, identified as P3-1, constructed in 1990 **and expanded in 2003**, consisting of miscellaneous woodworking equipment ~~consisting of~~ including: table saws, belt sanders, pocket groove machines, edge sanders, radial arm saws, band saws, drill machine, pin routers, and panel saws using a **baghouse and** cyclone to control particulate emissions, ~~with a maximum capacity of 2.5 RVs per hour~~, exhausting to stacks D-1 **and D-2**.

Response 3:

See Response 2.

Comment 4:

Condition A.3(g), Plant 6, page 7 of 73: Definition should be changed to reflect Plant 3 expansion and these insignificant activities; most of the welding operations have been relocated into Plant 3. Condition A.3(g) should be changed to state:

- (g) A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, ~~with a maximum capacity of 2.5 units per hour~~, with no emission control and exhausting to general building exhaust."

Response 4:

See Response 2.

Comment 5:

Condition A.3(t), Plant 8, page 8 of 73: Plant number should be changed to reflect current description. Change description to: Roadmaster – Plant 50.

Response 5:

The change in descriptive information has been made in Sections A.3, D.1 and D.5 of the permit as shown:

Roadmaster Plant - Plant **50 8**

Comment 6:

Condition A.3(v), Plant 8, page 8 of 73: Plant number should be changed to reflect current description. Change description to: Aftermarket Fiberglass Plant – Plant 8.

Response 6:

The change in descriptive information has been made in Sections A.3, D.3 and D.5 of the permit as shown:

Aftermarket Fiberglass Plant – Plant **8 50**

Comment 7:

Condition A.3, Emission Unit Notification, page 9 of 73: This Condition references Sections A.2 and A.3 which is incorrect. The correct reference should be to Sections A.3 and A.4 respectively. Therefore, Condition A.3, Emission Unit Notification, should be revised as follows:

Emission Unit Notation

Equipment lists from Construction Permit # 039-9835-00182, issued on July 10, 1998, Construction Permit # 039-4577-00182, issued on March 26, 1996, and Source Modification # 039-11468-00182, issued May 3, 2000, do not accurately describe current emission units at the source, because some units have been modified or eliminated from the source, or were erroneously described in a previously issued permit. Equipment lists from previously issued permits will be replaced by Section ~~A.2~~ **A.3** Emission Units and Pollution Control Equipment Summary and Section ~~A.3~~ **A.4** Specifically Regulated Insignificant Activities in this Part 70 permit.

Response 7:

The Emission Unit Notation in Condition A.3 has been revised as follows:

Equipment lists from Construction Permit # 039-9835-00182, issued on July 10, 1998, Construction Permit # 039-4577-00182, issued on March 26, 1996, and Source Modification # 039-11468-00182, issued May 3, 2000, do not accurately describe current emission units at the source, because some units have been modified or eliminated from the source, or were erroneously described in a previously issued permit. Equipment lists from previously issued permits will be replaced by Section ~~A.2~~ **A.3** Emission Units and Pollution Control Equipment Summary and Section ~~A.3~~ **A.4** Specifically Regulated Insignificant Activities in this Part 70 permit.

Comment 8:

Condition A.4(b), page 9 of 73: The description for this Condition should be revised because it implies that all of the emission control equipment included in the general description are used at the unit. Therefore, Condition A.4(b) should be revised as follows:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2]

Response 8:

The change has been made in Sections A.4 and D.5 of the permit as follows:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2]

Comment 9:

Condition B.9(a), page 11 of 73: Because of recent changes in the emission reporting rules, the deadline to submit the Annual Certification should be changed to July 1. Therefore, Condition B.9 (a) should be revised as follows: "... All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter no later than **July 1** of each year to:".

Response 9:

The rules for the emission reporting do not affect the requirements of 326 IAC 2-7-6(5) or this condition. Therefore, the due date for the Annual Compliance Certification report remains April 15, and no change is made Condition B.9.

Comment 10:

Condition B.10(a), page 11 of 73: Preventative Maintenance Plans are only required for control equipment. Therefore, the reference to facilities being subject to the PMP requirements should be deleted from the Condition. In addition, other Conditions in this draft permit limit PMPs to control devices. Therefore, Condition B.10(a) should be revised as follows:

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information ~~on each facility~~:

Response 10:

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5. Therefore, no change is made to Condition B.10(a).

Comment 11:

Condition B.10(c), page 12 of 73: The second sentence in this Condition should be deleted because it allows IDEM to order the Permittee to revise a Preventative Maintenance Plan in certain circumstances and the circumstances identified in this Condition are not specified in the underlying regulations. Therefore, this sentence exceeds the requirements of 326 IAC 2-7-5(1), (3) and (13), 326 IAC 2-7-6(1) and (6), and 326 IAC 1-6-3. Condition B.10(c) should be revised as follows:

- (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 or potential to emit.** The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7- 1(34).

Response 11:

IDEM, OAQ disagrees. Under 326 IAC 2-7-5(1), IDEM, OAQ does have the authority to include requirements that assure compliance with all applicable requirements. If an exceedance has occurred, IDEM, OAQ may determine it necessary for the Permittee to revise its PMP in order to prevent another exceedance. Therefore, no change will be made to Condition B.10(c).

Comment 12:

Condition B.11(h), page 13 of 73: This Condition requires quarterly filing of deviation and compliance monitoring reports. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Monaco sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. Therefore, this Condition should be revised by deleting the words "Quarterly" and replacing them with the phrase "Semi-Annual." Condition B.11(h) should be revised as follows:

- (h) The Permittee shall include all emergencies in the **Quarterly Semi-Annual** Deviation and Compliance Monitoring Report.

Response 12:

IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviation reports within ten (10) days of the

deviation occurring. It was determined that as long as deviations were reported quarterly, it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. Therefore, no change will be made to Condition B.11(h).

Comment 13:

Condition B.14(a), page 15 of 73: This Condition requires quarterly filing of deviation and compliance monitoring reports. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Monaco sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. Therefore, this Condition should be revised by deleting the words "Quarterly" and replacing them with the phrase "Semi-Annual." Condition B.14(a) should be revised as follows:

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached ~~Quarterly~~ **Semi-Annual** Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The ~~Quarterly~~ **Semi-Annual** Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 13:

IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviation reports within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly, it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. Therefore, no change will be made to Condition B.14(a).

Comment 14:

Condition B.21(e), page 19 of 73: Condition B.21(e) should be deleted because it is not one of the listed authorizations in 326 IAC 2-7-6(2) or the referenced statutes and exceeds the authority granted by that rule and those statutes.

Response 14:

IDEM, OAQ disagrees: In addition to the right to entry, IC 13-14-2-2 and 326 IAC 2-7-6(2) gives IDEM, OAQ the authority to inspect. As part of an inspection it may be necessary to use equipment to document the conditions in order to assure compliance with an applicable requirement and this permit. Therefore, no change will be made to Condition B.21(e).

Comment 15:

Condition C.1(a), page 21 of 73: This Condition incorrectly states the applicable requirements of the version of 326 IAC 6-3 that was incorporated into 40 CFR 52, Subpart P. The version of 326 IAC 6-3 that was incorporated into 40 CFR 52, Subpart P, does not specify the appropriate emission rate for processes with a process weight rate of less than 100 pounds per hour. Therefore, stating 40 CFR 52, Subpart P, requires processes with a process weight rate of less than 100 pounds per hour to comply with an emission rate of 0.551 pounds per hour is incorrect. This Condition should be revised to accurately reflect the requirements contained in 40 CFR 52, Subpart P, or deleted.

Response 15:

IDEM, OAQ disagrees: Pursuant to 40 CFR 52, Subpart P, the table's lowest listed process weight rate is one hundred (100) pounds per hour, and its allowable emission rate is 0.551 pounds per hour. Emission limitations for process weights of less than one hundred (100) pounds per hour are not specifically identified in the table, but are not exempt from the rule. Emissions from processes with a process weight rate of less than one hundred (100) pounds per hour can still be considered. In 2002, the Indiana Air Pollution Control Board amended 326 IAC 6-3 to make clear that sources with process weight levels below one hundred (100) pounds per hour shall limit their particulate emissions to 0.551 pounds per hour. Therefore, no change will be made to Condition C.1(a).

Comment 16:

Condition C.6, page 21 of 73: This Condition should be revised because it fails to require the use of air pollution control equipment only if the emission unit is venting to the atmosphere. Therefore, this Condition should be revised as follows by adding the phrase "and venting to the atmosphere" at the end of the Condition:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

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

Response 16:

IDEM, OAQ disagrees: The control device shall be operated at all times the emission unit is operating. In addition, exhausting into the building does not assure that no particulate matter (PM) will be emitted into the atmosphere due to the opening of windows and/or doors. Therefore, no change will be made to Condition C.6.

Comment 17:

Condition C.9, page 22 of 73: It appears that the word "by" is missing in the first sentence. Therefore, Condition C.9 should be revised as follows:

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.

Response 17:

The change has been implemented as shown:

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.

Comment 18:

Condition C.14, pages 24 and 25 of 73: This Condition should be deleted because neither 326 IAC 2-7-5 nor 326 IAC 2-7-6 authorize a "Compliance Response Plan." In addition, the Condition fails to recognize that a compliance response plan does not have to be an entirely new document. To the extent a compliance response plan is necessary, the plan should be able to reference information contained in other documents.

Response 18:

IDEM, OAQ disagrees: IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language. The plans are fully supported by rules promulgated by the Air Pollution Control Board. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." The Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. Response maintenance included inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and set the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the equipment to prevent an exceedance of an emission limit or violation of other permit requirements.

After issuing the first draft Title V permits in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was to remove the corrective action and related schedule requirements from the PMP requirement and place them into some other requirement. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring.

IDEM agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to

"response steps."

The CRP response steps and schedule requirements are examples of documenting procedures developed from good business practices and the prevention of environmental problems. Permittees already have maintenance schedules and trouble shooting guides that specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

In addition, the Permittee needs to have a document considered a "Compliance Response Plan"; however, the Permittee can reference information contained in other documents within this CRP.

Therefore, no change will be made to Condition C.14.

Comment 19:

Conditions C.16(a) and (b), pages 25 and 26 of 73: The deadline to submit emission statements should be consistent with the annual certification report and revised emission reporting rule. The reporting date should be July 1 and the time period for those reports in Condition C.16(b) should be January 1 through December 31. Conditions C.16(a) should be changed to, "... must be received by ~~April 15~~ July 1 of each reporting ...". And Condition C.16(b) should be changed to: "starting ~~December 1 and ending November 30~~ January 1 and ending December 31. The..."

Response 19:

Since the rule revisions are not effective, the provisions that will be required by the revised rule will not be incorporated at this time. The condition will be revised so that the Permittee is required to follow the requirements of the rule, including the revised rule when it becomes effective, instead of requiring in the condition that the emission statement to be submitted on April 15. Once the rule becomes effective, the Permittee may request an amendment to the operating permit in order to incorporate specific requirements of the revised rule.

Therefore, Condition C.16 is amended as follows:

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]

(a) The Permittee shall submit an ~~annual~~ emissions statement certified pursuant to the requirements of 326 IAC 2-6, ~~that must be received by April 15 of each year and~~ **This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and** must comply with the minimum requirements specified in 326 IAC 2-6-4. **The submittal should cover the period identified in 326 IAC 2-6.** The ~~annual~~ emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b e) The annual emission statement 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 d) The requirement from CP 039-9835-00182, issued July 10, 1998, Condition C.11(a) and (b), and the requirement from CP 039-4577-00182, issued on March 26, 1996, Operation Condition #8, describing 326 IAC 2-6 Emission Reporting requirements, are not applicable because they have been replaced by similar descriptions of Emission Reporting requirements which developed from the resolution of appeal to CP-039-9835-00182, Cause No. 98-A-J-2075.

Comment 20:

Condition C.17(a), page 26 of 73: Unlike another draft Title V permit that Monaco is aware of, this Condition does not provide for records that are electronically maintained and accessible. Therefore, Condition C.17(a) should be revised as follows:

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be **kept physically present or electronically accessible** at the source location **or available within 1 hour**, 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.

Response 20:

The IDEM, OAQ agrees that the data can either be physically present or electronically accessible, thus Condition C.17 (a) has been amended as follows:

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

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be **kept 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.

Comment 21:

Condition C.18(a), page 26 and 27 of 73: This Condition requires the quarterly submission of deviation and compliance monitoring reports. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Monaco sees

no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. In addition, this Condition requires the report to be submitted within thirty (30) days of the end of the reporting period. This time period is not specified in the underlying regulations and may be an insufficient amount of time for Monaco to prepare and file the report. Therefore, Condition C.18(a) should be revised as follows:

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached **Quarterly Semi-Annual** Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within ~~thirty (30) days~~ **sixty (60) days** of the end of the reporting period. The **Quarterly Semi-Annual** Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 21:

IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviation reports within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition C.18.

Comment 22:

Condition C.18(d), page 26 of 73: This Condition requires all reports to be submitted within thirty (30) days of the end of the reporting period unless otherwise specified in the permit. This time period is not specified in the underlying regulations and may be an insufficient amount of time for Monaco to prepare and file reports. Therefore, the phrase "thirty (30)" should be deleted and replaced with the phrase "sixty (60)." In addition, this Condition refers to quarterly reports. Condition C.18(d) should be revised as follows:

- (d) Unless otherwise specified in this permit, any **quarterly semi-annual** report required in Section D of this permit shall be submitted within ~~thirty (30) days~~ **sixty (60) days** of the end of the reporting period. The reports require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 22:

IDEM, OAQ disagrees: 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition C.18(d).

Comment 23:

Section D.1, Plant 3, page 29 of 73: The "Plant 3" description of the towable assembly area does not include the 2003 expansion. Therefore, Section D.1(e), Plant 3, should be revised as follows:

A towable assembly area, which uses hand applied caulks, adhesives, paints and solvents identified as P3-2, constructed in 1990 and expanded in 2003, with no emission control and exhausting to general building exhaust.

Response 23:

See Response 2.

Comment 24:

Section D.1, Plant 3, page 29 of 73: The "Plant 6" description of the welding and metal working area does not include the 2003 Plant 3 expansion. Therefore, Section D.1(g), Plant 6, should be revised as follows:

A welding and metal working area, identified as P6-6, constructed in 1990, with 30 welders, with no emission control and exhausting to general building exhaust.

Response 24:

See Response 2.

Comment 25:

Section D.1, Customer Service Facilities, page 29 of 73: The "Customer Service Facilities" title references three plants - 7, 8, and 9. However, the title in Condition A.3 for Customer Service Facilities only references two plants - 7 and 9. The reference to Plant 8 should be deleted from Section D.1, Customer Service Facilities. Therefore, Section D.1, Customer Service Facilities, should be revised as follows:

Customer Service Facilities - In-house Plants 7, ~~8~~, & 9

Response 25:

The change was made to the Facility Description box for Section D.1 as shown:

Customer Service Facilities - In-house Plants 7, ~~8~~, & 9

Comment 26:

Section D.1, page 30 of 73: The "Plant 8" description is for the aftermarket fiberglass area. Therefore, Section D.1(u), Roadmaster Plant - Plant 8, should be revised as follows:

Roadmaster Plant – In-house Plant 50

Response 26:

The change in descriptive information has been made in Sections A.3, D.1 and D.5 of the permit as shown:

Roadmaster Plant - In-house Plant **50 8**

Comment 27:

Condition D.1.2(a), page 30 of 73: The deadline for the Permittee to comply with 40 CFR Part 63, Subpart Mmmm, identified in this Condition conflicts with the deadline in 40 CFR Part 63, Subpart Mmmm, and Condition D.1.3(a). Therefore, this Condition should be revised as follows:

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements **on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products by the deadline specified in Condition D.1.3(a).**

Response 27:

There is no conflict. Condition D.1.2(a) refers to the General Provisions of 40 CFR Part 63, which are applicable to this existing source on and after the effective date of 40 CFR Part 63, Subpart Mmmm. For example, the requirement to submit an initial notification is required under the General Provisions. Condition D.1.3(a) refers to the specific requirements of NESHAP Mmmm, which for this existing source, the Permittee must be in compliance with on and after the date which is three (3) years after the effective date of the rule. No change to the permit has been made as a result of this comment.

Note: This NESHAP was published in the Federal Register on January 2, 2004, thus, this date is the effective date of the rule. Therefore, the specific date has been inserted in the permit language where applicable:

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart Mmmm] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products **January 2, 2004.**

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart Mmmm] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] [326 IAC 20]

- (a) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after **January 2, 2007** ~~the date 3 years after the effective date of 40 CFR Part 63, Subpart Mmmm.~~

D.1.13 Notification Requirements [40 CFR 63.3910] [326 IAC 20]

- (b) Initial notification. The Permittee must submit the initial notification no later than **January 2, 2005** ~~1 year after the effective date of 40 CFR Part 63, Subpart M~~.

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

- (b) The significant permit modification application shall be submitted no later than **April 2, 2006** ~~twenty-seven months after the effective date of 40 CFR 63, Subpart M~~.

Comment 28:

Condition D.1.3(d), page 31 of 73: The citation to 40 CFR 63.3980 is incorrect. The citation should be 40 CFR 63.3981. Therefore, Condition D.1.3(d) should be revised as follows:

- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR ~~63.3980~~ **63.3981**, and are applicable to the affected source.

Response 28:

The IDEM, OAQ agrees. The change has been made to Condition D.1.3(d) as shown:

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] [326 IAC 20]

- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981~~0~~, and are applicable to the affected source.

Comment 29:

Condition D.1.10(a)(1), page 32 of 73: Unlike another draft Indiana Title V permit, this Condition requires the training of existing operators regardless of when they last attended training and fails to include a time period to train new and transferred employees. Therefore, Condition D.1.10(a)(1) should be revised as follows:

- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed in the last twelve months**. All new operators shall be trained **upon within thirty (30) days of** hiring or transfer.

Response 29:

The IDEM, OAQ agrees. Condition D.1.10 has been amended as follows:

D.1.10 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program.
- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed within the last twelve (12) months**. All new operators shall be trained **upon within thirty (30) days of** hiring or transfer.

Comment 30:

Condition D.1.11(a), page 33 of 73: This Condition requires records unnecessary to demonstrate compliance with applicable requirements. Therefore, Condition D.1.11(a) should be revised as follows:

- (a) To document compliance with Conditions D.1.1 and D.1.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within ~~30~~ 60 days of the end of each compliance period.
- (1) No change.
~~(2) Delete~~
~~(3) Delete~~
~~(4) Delete~~
~~(5) Amount of coating material and solvent, less water, used on a monthly basis. Records shall be sufficient to show compliance and may include: purchase orders, invoices, material safety data sheets (MSDS) as necessary to verify type and amount of material used.~~

Response 30:

The compliance period for referenced limitations is the most recent twelve (12) consecutive month period. If the records are not completed within 30 days of the end of each compliance period, the Permittee would not be able to demonstrate compliance with the limitation. Condition D.1.1 is a HAPs usage limit which is needed to ensure that HAPs emissions from R-30, R-31, R-32 and R-33 are less than the major source thresholds. This limit includes HAPs from clean-up solvents. In addition the weight of each single HAP and the weight of the combination of HAPs emitted from coatings and cleanup for each compliance period is necessary to document compliance with Condition D.1.1 and can not be deleted from the record keeping requirements. However, since the limitation includes HAPs from clean-up solvents, it is not necessary to differentiate between solvents added to coatings and solvent used for clean-up. Therefore, Condition D.1.11(a)(5) has been changed as shown:

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.9, the Permittee shall maintain records in accordance with (1) through (~~5~~) below. Records maintained for (1) through (~~5~~) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The single HAP content and combination of HAP content of each coating material, solvent, and clean-up solvent used;
- (2) The clean-up solvent usage for each month;
- (3) The total usage for each single HAP and the total for the combination of HAP usage for each month;
- (4) The weight of each single HAP and the weight of the combination of HAP emitted from coatings and cleanup for each compliance period; and
- (5) The amount of coating material and solvent less water used on a monthly basis.

- (A) — Records shall include purchase orders, invoices, 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 for cleanup solvents.~~

Comment 31:

Condition D.1.11(b), page 37 of 73: This Condition requires records necessary to demonstrate compliance to be available within 30 days of the end of each compliance period. This time period is not specified in the underlying regulations and may be an insufficient amount of time for Monaco to make the records available. Therefore, the number “30” should be deleted and replaced with the number “60.” Condition D.1.11(b) should be revised as follows:

- (b) To document compliance with Conditions D.1.6 and D.1.9, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.6. Records necessary to demonstrate compliance shall be available within ~~30~~ **60** days of the end of each compliance period.
- (5) **Amount of coating material and solvent, less water, used on a monthly basis. Records shall be sufficient to show compliance and may include: purchase orders, invoices, material safety data sheets (MSDS) as necessary to verify type and amount of material used.**

Response 31:

The compliance period for referenced limitations is the most recent twelve (12) consecutive month period. If the records are not completed within 30 days of the end of each compliance period, the Permittee would not be able to demonstrate compliance with the limitation. Condition D.1.6 is a VOC content limitation pursuant to 326 IAC 8-2-9. Since the content limitation prescribed by 326 IAC 8-2-9 does not apply to clean-up solvents, it is necessary to differentiate between solvents added to coatings and those used for cleanup. Therefore, no change is made to Condition D.1.11(b) as a result of this comment.

Comment 32:

Condition D.1.11(d), page 34 of 73: This condition requires documentation of coating application rates for P3-2 and customer service facility to demonstrate compliance with Condition D.1.8(b). Condition D.1.8(b) is a daily particulate emission limit and does not apply to aerosol cans or minor touch-up and repair operations. Therefore, this condition should be deleted.

Response 32:

326 IAC 6-3 can apply to aerosol cans or touch-up and repair surface coating operations that use more than five gallons of coating per day. The record keeping requirement in Condition D.1.11(d) is needed to verify that these emission units remain exempt from the requirements of 326 IAC 6-3.

Comment 33:

Condition D.1.12, page 34 of 73: This Condition requires the submission of quarterly summary reports within thirty (30) days after the end of the reporting period. Neither the submission frequency or time period in which to submit the report are specified in the underlying regulations. Therefore, Condition D.1.12 should be revised as follows:

D.1.12 Reporting Requirements

A **quarterly semi-annual** summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within **thirty (30) days sixty (60) days** after the end of the **quarter semi-annual period** being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 33:

326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.1.12.

Comment 34:

Condition D.2.1, title, page 36 of 73: The title of this Condition contains a citation that does not exist. The citation in question is 40 CFR 63.2398. The citation to 40 CFR 63.2398 in the title should be deleted.

Response 34:

The citation in the title of Condition D.2.1 has been corrected as follows:

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501 2398]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

Comment 35:

Condition D.2.1(a), page 36 of 73: The deadline for the Permittee to comply with 40 CFR Part 63, Subpart P, identified in this Condition conflicts with the deadline in 40 CFR Part 63, Subpart P, and Condition D.2.2(a). Therefore, this Condition should be revised as follows:

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements ~~on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products by the deadline specified in Condition D.2.2(a).~~

Response 35:

There is no conflict. Condition D.2.1(a) refers to the General Provisions of 40 CFR Part 63, which are applicable to this existing source on and after the effective date of 40 CFR Part 63, Subpart PPPP. For example, the requirement to submit an initial notification is required under the General Provisions. Condition D.2.2(a) refers to the specific requirements of NESHAP PPPP, which for this existing source, the Permittee must be in compliance with on and after the date which is three (3) years after the effective date of the rule. No change to the permit has been made as a result of this comment.

Comment 36:

Condition D.2.5(b), page 37 of 73: This Condition does not reflect current permit conditions and should be corrected to represent current permit conditions. Therefore, Condition D.2.5(b) should be revised as follows:

- (b) Pursuant to SSM 039-11468-00182 issued on May 3, 2000 and revised through the Part 70 Operating Permit, the input of VOC to paint bay P4-37 and P4-38, when coating FRP substrates, solvent spray from application equipment during clean-up or color change shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in a manner that evaporation is minimized. This requirement to operate the control is not federally enforceable.

Response 36:

Condition D.1.6(b) requires that solvents sprayed from P4-37 and P4-38 during clean-up or color change be directed into containers. This is pursuant to 326 IAC 8-2-9, which is applicable when P4-37 and P4-38 are conducting metal coating operations.

However, since P4-37 and P4-38 also apply coatings to FRP substrates, were constructed after 1980, and have potential VOC emissions of twenty-five (25) tons per year or more, the general reduction requirements (326 IAC 8-1-6) could apply to these facilities. P4-37 and P4-38 were new facilities at the time of review of SSM 039-11468-00182. Based on the source modification, the potential emissions were determined to be greater than twenty-five (25) tons per year per facility. Therefore, the VOC input limit of less than twenty-five (25) tons per year per facility when coating FRP substrates is needed to ensure that the requirements of 326 IAC 8-1-6 are not applicable to P4-37 and P4-38. Note that VOC input when coating metal substrates does not count against the twenty-five (25) ton per year limitation for these facilities. No change has been made to Condition D.2.5(b) as a result of this comment.

Comment 37:

Condition D.2.6, page 38 of 73: This Condition should be revised to include the following at the end of the first sentence: "when venting to the atmosphere." Requiring the use of a dry particulate filter when units are venting indoors exceeds the regulatory requirements and is inconsistent with a comparable Condition in another draft Indiana Title V permit. Therefore, Condition D.2.6 should be revised as follows:

D.2.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations shall be controlled by dry filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications **when venting to the atmosphere**. This requirement to operate the control is not federally enforceable.

Response 37:

IDEM, OAQ disagrees: The control device shall be operated at all times the emission unit is operating. In addition, exhausting into the building does not assure that no particulate matter (PM) will be emitted into the atmosphere due to the opening of windows and/or doors. Therefore, no change will be made to Condition D.2.6.

Comment 38:

Condition D.2.8(a)(1), page 38 of 73: Inconsistent with other draft Indiana Title V permits, this Condition requires the training of existing operators regardless of when they last attended training and fails to include a time period to train new and transferred employees. Therefore, Condition D.2.8(a)(1) should be revised as follows:

- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed in the last twelve months**. All new operators shall be trained **upon within thirty (30) days of** hiring or transfer.

Response 38:

The IDEM, OAQ agrees. Condition D.2.8 has been amended as follows:

D.2.8 Operator Training Requirements

(a) The Permittee shall implement an operator-training program.

- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed within the last twelve (12) months**. All new operators shall be trained ~~upon~~ **within thirty (30) days of** hiring or transfer.

Comment 39:

Condition D.2.9(a), page 38 of 73: This Condition requires records unnecessary to demonstrate compliance with applicable requirements. Therefore, Condition D.2.9(a) should be revised as follows:

- (1) No change.
- ~~(2) Delete~~
- ~~(3) Delete~~
- ~~(4) Delete~~
- ~~(5) Amount of coating material and solvent, less water, used on a monthly basis. Records shall be sufficient to show compliance and may include: purchase orders, invoices, material safety data sheets (MSDS) as necessary to verify type and amount of material used.~~

Response 39:

The usage and VOC contents, as well as the weight of VOC emitted for each coating and solvent used is necessary to document compliance with Condition D.2.5(b) and can not be deleted from the record keeping requirements. Since it is not necessary to differentiate between solvents added to coatings and those used for cleanup Condition D.2.9(a)(5), has been revised as shown:

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5(b), the Permittee shall maintain records in accordance with (1) through ~~(54)~~ below. Records maintained for (1) through ~~(54)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each metal surface coating material and solvent used;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month;
- (4) The weight of VOCs emitted for each compliance period; and
- (5) The amount of coating material and solvent less water used on a monthly basis.

~~(A) — Records shall include purchase orders, invoices, 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 for cleanup solvents.~~

Comment 40:

Condition D.2.10, page 39 of 73: This Condition requires the submission of quarterly summary reports within thirty (30) days after the end of the reporting period. Neither the submission frequency or time period in which to submit the report are specified in the underlying regulations. Therefore, Condition D.2.10 should be revised as follows:

D.2.10 Reporting Requirements

A ~~quarterly~~ **semi-annual** summary of the information to document compliance with Condition D.2.5(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within ~~thirty (30) days~~ **sixty (60) days** after the end of the ~~quarter~~ **semi-annual period** being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 40:

326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.2.10 or the report forms.

Comment 41:

Condition D.3.1(a)(5)(B), page 44 of 73. This Condition establishes unreasonable and unnecessary work practices to demonstrate compliance with applicable requirements. Therefore, Condition D.3.1(a)(5)(B) should be revised as follows:

(B) For VOC and HAP containing materials:

~~(A) Delete~~

~~(B) Delete~~

~~(C) Delete~~

~~(D) Delete~~

~~(E) Solvent sprayed during clean-up or resin changes shall be directed into containers. Containers shall be closed as soon as solvent spraying is completed and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

Response 41:

These types of work practices have been determined to be required pursuant to 326 IAC 2-4.1, as part of the Maximum Achievable Control Technology (MACT), for these types of fiberglass reinforced plastic production units. Condition D.3.1(a) replaces the similar MACT conditions contained in Condition D.1.2 of CP 039-9835-00182, issued July 10, 1998, as determined through the resolved appeal to CP-039-9835-00182, Cause No. 98-A-J-2075. No change to the permit has been made as a result of this comment.

Comment 42:

Condition D.3.1(c), page 44 of 73. This Condition uses the term Potential to Emit (PTE) to describe a permit limit. To clarify the permit condition, the term PTE should be replaced with actual. Therefore, Condition D.3.1(c) should be revised as follows:

(c) Pursuant to SSM 039-11468-00182, issued May 3, 2000, combined units F-34 and F-35 at the Aftermarket Fiberglass Plant shall be limited to the use of coatings, resins, gelcoats, dilution solvents, and clean-up solvents of any single hazardous air pollutant of less than 10 tons per twelve (12) consecutive month period, and a combined HAP limit of less than 25 tons per any twelve (12) consecutive month period where compliance is determined at the end of each month. Therefore, 326 IAC 2-4.1-1 (New Facilities: General Reduction Requirements) does not apply.

Response 42:

Condition D.3.1(c) has been changed as shown in order to more accurately reflect the intent of the Condition D.3.1(c).

D.3.1 New Source Toxics Control [326 IAC 2-4.1-1] [40 CFR 63.41]

(c) Pursuant to SSM 039-11468-00182, issued May 3, 2000, **and revised through the Part 70 Operating Permit**, combined units F-34 and F-35 at the Aftermarket Fiberglass Plant shall be limited such that the **emissions potential to emit (PTE)** from the use of coatings, resins, gel coats, dilution solvents and cleanup solvents of any single hazardous air pollutant shall be limited to less than ten (10) tons per twelve (12) consecutive month period, and the **emissions PTE** of any combination of HAP shall be limited to less than twenty five (25) tons per twelve (12) consecutive month where compliance is determined at the end of each month. Therefore, 326 IAC 2-4.1-1 (New Facilities: General Reduction Requirements) does not apply.

Comment 43:

Condition D.3.6(a), page 46 of 73. Monaco has applied for permit modification to allow averaging across resin and gel coat categories. Therefore, the second paragraph following the table in Condition D.3.6(a) should be revised as follows:

(a) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging ~~within each~~ **across two or more** resin or gel coat application categories listed in subsection (a) by the use of

Response 43:

The request to allow averaging across resin and gel coat categories was contained in the pending application 039-15246-00182, received on January 22, 2002. More information is necessary to determine whether this type of emissions averaging will satisfy the requirements of 326 IAC 20-25 at Monaco Coach Corporation. If such approval is granted, this Part 70 Operating Permit will be modified through approval number 039-15246-00182.

Comment 44:

Condition D.3.9(b) and D.3.10(a), page 49 and 50 of 73: The Subpart WWWW rule was published in the April 21, 2003 Federal Register. As such, the requirements that Monaco Coach Corporation will need to satisfy have been established. Monaco Coach Corporation requests that IDEM include those requirements in this permit.

Response 44:

Although this NESHAP was published in the April 21, 2003 Federal Register, an existing source, such as Monaco Coach Corporation, has until April 21, 2006 to comply with the new HAP standards. Furthermore, the regulations allow the Permittee to choose a compliance method as outlined in 40 CFR 63.5810. Therefore Condition D.3.16 requires that the Permittee submit a significant permit modification nine (9) months prior to the April 21, 2006 compliance date. This application shall include information sufficient for IDEM, OAQ to incorporate the applicable requirements of 40 CFR 63, Subpart WWWW, into the Part 70 permit, including a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard. Therefore, no changes to the permit have been made as a result of this comment.

Comment 45:

Condition D.3.12(a)(1), page 58 of 73: Inconsistent with other draft Indiana Title V permits, this Condition requires the training of existing operators regardless of when they last attended training and fails to include a time period to train new and transferred employees. Therefore, Condition D.3.12(a)(1) should be revised as follows:

- (1) All operators that perform FRP production operations or FRP area maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed in the last twelve months**. All new operators shall trained **upon within thirty (30) days of** hiring or transfer.

Response 45:

The IDEM, OAQ agrees. Condition D.3.12 has been amended as follows:

D.3.12 Operator Training Requirements

- (a) The Permittee shall implement an operator-training program.
 - (1) All operators that perform FRP production operations or FRP area maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit **if training was not completed within the last twelve (12) months**. All new operators shall be trained **upon within thirty (30) days of** hiring or transfer.

Comment 46:

Condition D.3.13(a), page 52 of 73: This Condition requires records necessary to demonstrate compliance to be available within 30 days of the end of each compliance period. This time period is not specified in the underlying regulations and may be an insufficient amount of time for Monaco to make the records available. Therefore, the number "30" should be deleted and replaced with the number "60." Condition D.3.13(a) should be revised as follows:

- (a) To document compliance with Conditions D.3.1(a), D.3.1(c), D.3.4 and D.3.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly, and shall be complete and sufficient to establish compliance with the HAP emission limits described in Conditions D.3.1(a), D.3.1(c) and D.3.6, and the VOC emission limit described in Condition D.3.4. Records necessary to demonstrate compliance shall be available within ~~30~~ **60** days of the end of each compliance period.
 - (1) No change.
 - (2) No Change
 - (3) **Delete; no applicable requirement**
 - (4) **Delete; no applicable requirement**
 - (5) **Delete; no applicable requirement**
 - (6) **Amount of resin and gel coat used on a monthly basis:**
 - (A) **Records shall be sufficient to show compliance and may include: purchase orders, invoices, material safety data sheets (MSDS) as necessary to verify type and amount of material used.**
 - (B) **Delete; no applicable requirement**
 - (7) No Change

Response 46:

The compliance period for referenced limitations is the most recent twelve (12) consecutive month period. If the records are not completed within thirty (30) days of the end of each compliance period, the Permittee would not be able to demonstrate compliance with the limitation. The limitations in Section D.3 include total VOC and HAP emission limits, as well as HAP content limits for different types of resin and gel coat operations. Unlike some of the total VOC or HAP usage limits contained elsewhere in this Part 70 Operating Permit, the above limits are specific to resins and gel coats, and require that the Permittee calculate emissions resulting from the resin and gel coat operations. Since cleanup solvents are not included in these calculations, it is necessary to differentiate between solvents added to coatings and those used for cleanup. Therefore, no change is made to Condition D.3.13 as a result of this comment.

Comment 47:

Condition D.3.14, page 60 of 73: This Condition requires the submission of quarterly summary reports within thirty (30) days after the end of the reporting period. Neither the submission frequency or time period in which to submit the report are specified in the underlying regulations. Therefore, Condition D.3.14 should be revised as follows:

D.3.14 Reporting Requirements

A ~~quarterly~~ **semi-annual** summary of the information to document compliance with Conditions D.3.1(a), D.3.1(c), and D.3.4(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within ~~thirty (30) days~~ **sixty (60) days** after the end of the ~~quarter~~ **semi-annual period** being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 47:

326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.3.14 or the report forms.

Comment 48:

Section D.5, In-House Plant 3, subparagraph (f) page 56 of 73: Plant 3 completed an expansion in 2003 (Notice only). Part of this expansion included a new baghouse for the woodworking shop and higher production. Condition D.5(f) should be changed to state: "A woodworking shop, identified as P3-1, constructed in 1990 and expanded in 2003, consisting of miscellaneous woodworking equipment including: table saws, belt sanders, pocket groove machines, edge sanders, radial arm saws, band saws, drill machine, pin routers, and panel saws using a baghouse and cyclone to control particulate emissions, exhausting to stacks D-1 and D-2".

Response 48:

See Response 2.

Comment 49:

Section D.5, In-house Plant 6, subparagraph (g), page 56 of 73: Definition should be changed to reflect Plant 3 expansion and these insignificant activities; most of the welding operations have been relocated into Plant 3. Condition D.5(g) should be changed to state: "A welding and metal working area, with 30 welders, with no emission control and exhausting to general building exhaust."

Response 49:

See Response 2.

Comment 50:

Condition D.5(t), Roadmaster In-house Plant 8, page 56 of 73: Plant number should be changed to reflect current description. Change description to: Roadmaster – Plant 50

Response 50:

The change in descriptive information has been made in Sections A.3, D.1 and D.5 of the permit as shown:

Roadmaster Plant - Plant ~~50~~ 8

Comment 51:

Condition D.5(v), Aftermarket Fiberglass Plant – In-house Plant 50, page 56 of 73: Plant number should be changed to reflect current description. Change description to: Aftermarket Fiberglass Plant – Plant 8

Response 51:

The change in descriptive information has been made in Sections A.3, D.3 and D.5 of the permit as shown:

Aftermarket Fiberglass Plant – Plant ~~8~~ 50

Comment 52:

Section D.5, Insignificant Activities, subparagraph (b), page 56 of 73: The description for this subparagraph should be revised because it implies that all of the emission control equipment included in the description are used at the unit. Therefore, Section D.5, Insignificant Activities, subparagraph (b), should be revised as follows:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations

Response 52:

This change has been made in Sections A.4 and D.5 of the permit:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2]

Comment 53:

Condition D.5.3, page 58 of 73: This Condition should be revised to include the new baghouse in Plant 3 and add the following phrase at the end of the Condition: "and venting to the atmosphere." Requiring the use of a dry particulate filter when units are venting indoors exceeds the regulatory requirements and is inconsistent with a comparable Condition in another draft Indiana Title V Permit. Therefore, Condition D.5.3 should be revised as follows:

D.5.3 Particulate Matter (PM)

The dry filters, **baghouse** and cyclone dust collector for PM control shall be in operation and control emissions from the body shop P4-12, woodworking shop P3-1, closed-loop grinding booths DC-FG1 and DC-FG2, and grinding area DC-FG4 at all times that the units are in operation **and venting to the atmosphere.**

Response 53:

See Response 2 regarding the new baghouse in Plant 3. In addition the requirement to operate the dry filters and cyclone is valid whether or not the emissions are vented directly to the atmosphere. Therefore Condition D.5.3 has not been revised.

Comment 54:

Condition D.5.4(b), page 56 of 73: Visible emission notation for the body shop are burdensome and serve no environmental benefit for this insignificant type of operation; body work using only hand held tools. Accordingly, P4-12 should be removed from all visible emission monitoring requirements. Therefore, Condition D.5.4(b) should be deleted the phrase "**wood body shop P4-12 and**".

Response 54:

The control device must be in operation in order to ensure that the particulate emissions from this facility are less than the allowable emission rate of 30.5 pounds per hour, pursuant to 326 IAC 6-3. Therefore, no change to the permit has been made as a result of this comment.

Comment 55:

Condition D.5.4(f), page 56 of 73: As discussed above, Compliance Response Plans are not required by the underlying regulations. Therefore, Condition D.5.4(f) should be deleted in its entirety.

Response 55:

See Response 18.

Comment 56:

Condition D.5.5, page 58 of 73: Condition should be expanded to include the new baghouse. However, the requirement to perform inspections of cyclones and/or baghouses each calendar quarter is excessive and unnecessary. Therefore, the phrase "each calendar quarter" should be replaced with the phrase "semi-annually". Condition D.5.5 should be revised as follows:

D.5.5 Baghouse and Cyclone Inspections

An inspection shall be performed ~~each calendar quarter~~ **semi-annually** of the **baghouse and cyclone** controlling the woodworking shop P3-1 when venting to the atmosphere. **An equipment cyclone** inspection shall be performed within three months of redirecting vents to the atmosphere and **every three months semi-annually** thereafter. Inspections are optional when venting to the indoors.

Response 56:

IDEM, OAQ believes that an inspection period of longer than every quarter will usually not provide sufficient reporting of continuous compliance. In addition see Response 2 regarding the new baghouse. Therefore Condition D.5.5 has not been revised.

Comment 57:

Condition D.5.6, page 58 of 73: Condition should be expanded to include the new baghouse. Condition D.5.6 should be revised as follows:

D.5.6 Baghouse and Cyclone Failure Detections

In the event that a **baghouse or** cyclone failure **is** observed:

Response 57:

See Response 2.

Comment 58:

Condition D.5.7, page 58 of 73: The only areas using dry filters are the closed loop grinding booths or insignificant operations (i.e. body shop and aftermarket FRP). For the insignificant operations, daily visible emission monitoring is excessive and overly burdensome. Furthermore, as discussed above, Compliance Response Plans are not required by the underlying regulations. Therefore, the reference to Compliance Response Plans in this Condition should be deleted. Condition D.5.7 should be revised as follows:

D.5.7 Filter Inspections

Daily inspections **of the closed loop grinding booths** shall be performed to verify the placement, integrity and particle loading of the **filters when venting to the atmosphere**. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

Response 58:

See OAQ Change #4 below.

Comment 59:

Condition D.5.8, page 59 of 73: Record keeping requirements should be revised to reflect the notations above. Condition D.5.8 should be revised as follows:

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the visible emission notations of the ~~body shop P4-12~~, woodworking shop P3-1, and the closed loop grinding booths DC-FG1 and DC-FG2.

- (b) No Change
- (c) No Change

Response 59:

See Response 54.

Comment 60:

Condition D.6.3(a), page 69 of 73: This Condition requires unnecessary records and other records necessary to demonstrate compliance, to be available within 30 days of the end of each compliance period. Records with no relevant permit condition or limit should be deleted and, since the time period is not specified in the underlying regulations and as proposed may be an insufficient amount of time for Monaco to make the records available, Condition D.6.3(a) should be revised as follows:

D.6.3 Record Keeping Requirements

(a) To document compliance with Condition D.6.1(a) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and emission limit established in Condition D.6.1(a). Records necessary to demonstrate compliance shall be available within ~~30~~ **60** days of the end of each compliance period.

- (1) No change.
- (2) Amount of coating material, resin, gel coat and solvent, less water, and solvent, less water, used on a monthly basis. Records shall be sufficient to show compliance and may include: purchase orders, invoices, material safety data sheets (MSDS) as necessary to verify type and amount of material used.**
- (3) Delete; no applicable requirement.**
- (4) No change**
- (5) Delete, no applicable requirement.**
- (6) No change.
- (7) Delete, no applicable requirement**
- (8) No change.

Response 60:

The compliance period for referenced limitations is the most recent twelve (12) consecutive month period. If the records are not completed within 30 days of the end of each compliance period, the Permittee would not be able to demonstrate compliance with the limitation. IDEM agrees that since the limitations in Condition D.6.1(a) are total VOC limitations, it is not necessary to differentiate which solvents are added to coatings and which are used for cleanup solvents. Condition D.6.3 has been changed as follows:

D.6.3 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1(a) the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and emission limit established in Condition D.6.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material, resin, gel coat and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, 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 for cleanup solvents;~~
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (5) The cleanup solvent usage for each month;
 - (6) The total VOC coating usage for each month;
 - (7) The calculated total ~~volatile organic HAP~~ **VOC** emissions (based on material specific emission factors, emission reduction techniques and emission controls) from resin and gel coat use for each month.
 - (8) The weight of VOCs emitted for each compliance period.

Comment 61:

Condition D.6.4, page 69 of 73: This Condition requires the submission of quarterly summary reports within thirty (30) days after the end of the reporting period. Neither the submission frequency or time period in which to submit the report are specified in the underlying regulations. Therefore, Condition D.6.4 should be revised as follows:

D.6.4 Reporting Requirements

A **quarterly semi-annual** summary of the information to document compliance with Condition D.6.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within **thirty (30) days sixty (60) days** after the end of the **quarter semi-annual period** being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 61:

326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM, OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. IDEM, OAQ

has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.6.4 or the report forms.

Comment 62:

The Part 70 Quarterly Reports and the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report, pages 62 through 73 of 73: These reports identify the applicable time period as quarterly. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Monaco sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. Therefore, these reports should be revised by deleting the word "Quarterly" and replacing it with the phrase "Semi-Annual."

Response 62:

IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviation reports within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. Therefore, no change will be made to the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report, or the other Quarterly Reports.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

The facility descriptions for P5-5, P5-6 and P5-9 have been changed in Sections A.3 and D.1 as shown. Furthermore, the applicant has stated that these surface coating booths will not be converted to a fiberglass production area, therefore, all references to these booths have been removed from Section D.3 of the permit, and the appropriate change has been made to Condition D.6.1:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

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

- (r) Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, ~~each with a maximum capacity of metal parts to produce 4.5 recreational~~ **coating metal parts to produce a maximum of 4.5 recreational** vehicles per hour each with a maximum production capacity of 4.5 RVs per hour, and exhausting to stacks SV-5, SV-6, and SV-9

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Metal Surface Coating Units and All Degreasers

- (r) Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, ~~each with a maximum capacity of metal parts to produce 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and which will be converted to a fiberglass production area, to include four (4) chop and two (2) gelcoat stations, each with a maximum production capacity of 4.5 RVs per hour, and exhausting to stacks SV-5, SV-6, and SV-9~~ **coating metal parts to produce a maximum of 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and which will be converted to a fiberglass production area, to include four (4) chop and two (2) gelcoat stations, each with a maximum production capacity of 4.5 RVs per hour, and exhausting to stacks SV-5, SV-6, and SV-9**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: FRP Production Units

- (r) ~~Three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, each with a maximum capacity of metal parts to produce 4.5 recreational vehicles per hour, using dry filters to control particulate matter, and which will be converted to a fiberglass production area, to include four (4) chop and two (2) gelcoat stations, each with a maximum production capacity of 4.5 RVs per hour, and exhausting to stacks SV-5, SV-6, and SV-9~~

D.3.1 New Source Toxics Control [326 IAC 2-4.1-1] [40 CFR 63.41]

- (a) MACT for FRP production units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, **and** FF-1, P5-5, P5-6, and P5-9 shall be the following:

D.3.3 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the PM from FRP production units GB-1, FB-1, FB-2, FB-3, FB-4, ~~P5-5, P5-6, P5-9~~, F-34, and F-35 shall not exceed the pound per hour emission rate established as E in the following formula:

D.3.4 New facilities; general reduction requirement [326 IAC 8-1-6]

- (a) Pursuant to CP 039-9835-00182, issued on July 10, 1998, FRP production units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, **and** FF-1, ~~P5-5, P5-6, and P5-9~~ are subject to 326 IAC 8-1-6. The requirements for Best Available Control Technology (BACT) to control VOC emissions shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.3.1

D.3.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from FB-1, FB-2, FB-3, FB-4, ~~P5-5, P5-6, P5-9~~, F-34 and F-35 shall be controlled by dry filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.10 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:

- (1) The fiberglass mold prep and clean-up operation, identified as P5-1;
- (2) The fiberglass production operation consisting of a gelcoat booth, identified as GB-1, and the four (4) resin application stations, identified as FB-1, FB-2, FB-3;
- (3) The fiberglass closed tooling operation, identified as CT-1;
- (4) The fiberglass cure booth, identified as FCB-1, and the gelcoat cure booth, identified as GCB-1;
- (5) The one (1) fiberglass final finish area, identified as FF-1; **and**
- (6) ~~The three (3) surface coating booths, identified as P5-5, P5-6, and P5-9, which will be converted to a fiberglass production area, to include four (4) chop and two (2) gelcoat stations; and~~
- (7) The two (2) fiberglass production areas, identified as F-34 and F-35.

D.3.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1(a), D.3.1(c), D.3.4 and D.3.6, the Permittee shall maintain records in accordance with (1) through (74) below. Records maintained for (1) through (74) shall be taken monthly, and shall be complete and sufficient to establish compliance with the HAP emission limits described in Conditions D.3.1(a), D.3.1(c) and D.3.6, and the VOC emission limit described in Condition D.3.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each FRP material and solvent used for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, **and** FF-1, ~~P5-5, P5-6, and P5-9~~; The VOC, single HAP, and total HAP content of each FRP material and solvent used for combined units F-34 and F-35.
 - (4) The total HAP usage for each month for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, **and** FF-1, ~~P5-5, P5-6, and P5-9~~; the total VOC, single HAP, and total HAP usage for each month for combined units F-34 and F-35; and
 - (5) The weight of total HAP emitted for units P5-1, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FCB-1, GCB-1, **and** FF-1, ~~P5-5, P5-6, and P5-9~~ for each compliance period; the weight of VOCs, single HAP and total HAP emitted for combined units F-34 and F-35 for each compliance period.

D.6.1 PSD Minor Limit [326 IAC 2-2]

- (a) The total input of volatile organic compounds delivered to the applicators of surface coating units P4-1, P4-7, P4-8, P4-8A, P4-12, P4-37, P4-38, P6-6, P6-28, the customer service facility, P5-5, P5-6, P5-9, P5-10, P5-11, R-30, R-31, R-32 and R-33, including P3-2 and all adhesives and clean-up solvents, and total VOC emissions (based on material specific emission factors, emission reduction techniques and emission controls) from fiberglass units P4-12, P5-1, ~~P5-5, P5-6, P5-9~~, GB-1, FB-1, FB-2, FB-3, FB-4, CT-1, FF-1, FCB-1, GCB-1, F-34, and F-35, including adhesives and clean-up solvents, shall be limited to less than 245 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. This production limitation is equivalent to limiting the potential to emit volatile organic compounds to less than 245 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, will not apply.

Change 2:

Condition D.3.12 has been amended as shown to clarify that these operator training requirements are intended to demonstrate compliance with 326 IAC 6-3, as opposed to 326 IAC 20-25 which has separate operator training requirements in Condition D.3.8:

D.3.12 Operator Training Requirements

- (a) **In order to demonstrate compliance with Condition D.3.3**, the Permittee shall implement an operator-training program as follows:

Change 3:

In Condition D.5.5, "calendar" was misspelled as calender:

D.5.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking shop P3-1 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Change 4:

The grinding operations, identified as DC-FG1, DC-FG2, and DC-FG4 are recirculating units with no outside exhaust or duct work. Therefore, the requirement to perform daily inspections of the dry filters for these units is removed. The body shop (P4-12) already uses the operator training program instead of daily filter inspections, as stated in Condition D.2.8 of the Part 70 operating permit. Thus, Sections A.3, and D.5 are changed as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

- (w) A **closed loop** grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to **general building exhaust stack SV-4**

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Woodworking, Sanding, Grinding, and Welding Units

- (w) A **closed loop** grinding area, identified as DC-FG4, constructed in September 2000, with a maximum capacity of 1.0 units per hour, using dry filters to control particulate matter, and exhausting to **general building exhaust stack SV-4**

D.5.7 Filter Inspections Operator Training Requirements

~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

- (a) **The Permittee shall implement an operator-training program for the body shop P4-12.**

- (1) **All operators that perform buff, FRP repair, paint prep, or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.**
 - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
 - (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

Change 5:

The changes in Change #4 above have resulted in the following changes to Condition D.5.8, as shown:

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the visible emission notations of the body shop P4-12, woodworking shop P3-1, and the closed-loop grinding booths DC-FG1 and DC-FG2.
- (b) To document compliance with Conditions D.5.5 and ~~D.5.7~~, the Permittee shall maintain records of the results of the inspections required and the dates the vents are redirected.
- (c) **To document compliance with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (d e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 6:

In order to clarify the intent of the permit conditions, the IDEM, OAQ has made the following changes to the Part 70 Permit:

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

- (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 source~~ **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.

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The **Permittee source** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 **Maximum Achievable Control Technology (MACT)** Application in accordance with 40 CFR 63.52 (e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).