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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Monaco Coach Corporation
606 Nelson's Parkway
Wakarusa, 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. **This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.**

Operation Permit No.: T039-7559-00017	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2004 Expiration Date: June 21, 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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary source that is a multiple-plant complex that assembles and paints high-quality, luxury motor homes that vary in floor plan and length.

Responsible Official:	Chief Administrative Officer/ Senior Vice President
Source Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Mailing Address:	606 Nelson's Parkway, Wakarusa, IN 46573
Source Phone Number:	(260) 862-7347
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard; Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

Pursuant to CP 039-8662-00017, issued January 9, 1998, Monaco Coach Corporation's Nelson's Parkway Complex consists of the following plants:

- (a) Plant 1 (formerly Plant 30): Motorized recreational vehicle assembly
- (b) Plant 2: Final Paint
- (c) Plant 20: Welding and adhesive application
- (d) Plant 22: Metal shop
- (e) Plants 23 & 24: Normal maintenance operations
- (f) Plant 25: Warehouse and Tile Floor Set
- (g) Plant 26: White glove inspection (formerly called Undercoating)
- (h) Plant 27: Storage
- (i) Plant 28: Formtec/Thermoforming
- (j) Plant 29: Towable service center (formerly called Molds research & development)
- (k) Plant 31: Sewing, warehouse, white glove and cap assembly (formerly a paint area)
- (l) Plant 32: R&D shop and warehouse
- (m) Plant 33: Compressor building

- (n) Plant 34: Fire pump
- (o) Plant 36: Fiberglass fabrication
- (p) Plant 37: Fiberglass molding
- (q) Plant 38: R&D machine shop and print shop
- (r) Plant 39: Training Center and Overflow Service Center
- (s) Plant 46: Dispatch

Since these twenty (20) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

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:

- (a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:
 - (1) One (1) dip tank coating operation, identified as SV1-5, constructed in 1991 and reconstructed in 1997, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-5;
 - (2) Two (2) surface coating booths for chassis painting, identified as SV1-3 and SV1-4, each constructed in 1991 and reconstructed in 1997, each with a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting to stacks SV1-3 and SV1-4, respectively;
 - (3) One (1) woodworking millroom, identified as D1-01, constructed in 1997, a maximum capacity of 2000 pounds of wood per hour, with emissions controlled by a baghouse, and exhausting to stack DV1-01;
 - (4) One (1) sidewall adhesive application process, identified as SV1-6, constructed in 1997, a maximum capacity of 1.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-6;
 - (5) Three (3) manual assembly lines, using caulks, sealants, cleaners, and various hand tools, identified as D1-04, each line constructed in 1997, a total maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to general ventilation vent GV1-01;
 - (6) Eighty-four (84) welding stations, constructed in 1998, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, exhausting to general ventilation vent GV1-02;
- (b) Plant 2: A final paint plant, consisting of:
 - (1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 10 units (motor homes) per

day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively;

- (2) One Full Paint Line B, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-20, SV2-21, and SV2-22, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-20, SV2-21, and SV-22, respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-23, SV2-24, SV2-25, and SV2-26, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-23A, SV2-23B, SV2-24A, SV2-24B, SV2-25A, SV2-25B, SV2-26A, and SV2-26B, respectively;
- (3) One Full Paint Line C, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-13, SV2-14, and SV2-15, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-13, SV2-14, and SV2-15 respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-16, SV2-17, SV2-18, and SV2-19, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-16A, SV2-16B, SV2-17A, SV2-17B, SV2-18A, SV2-18B, SV2-19A, and SV2-19B, respectively;
- (4) One Full Paint Line D, constructed in 2003, consisting of:
 - (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-7 and SV2-8 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-7 and SV2-8, respectively;
 - (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-9, SV2-10, SV2-11, and SV2-12, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-9A, SV2-9B, SV2-10A, SV2-10B, SV2-11A, SV2-11B, SV2-12A, and SV2-12B, respectively;
- (5) One Full Paint Line E, constructed in 2003, consisting of:

- (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-1 and SV2-2 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-1 and SV2-2, respectively;
- (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-3, SV2-4, SV2-5, and SV2-6, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-3A, SV2-3B, SV2-4A, SV2-4B, SV2-5A, SV2-5B, SV2-6A, and SV2-6B, respectively;
- (6) One (1) repair area, consisting of:
 - (A) One (1) paint repair booth, identified as SV2-30, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-30;
 - (B) One (1) paint repair booth, identified as SV2-31, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-31;
 - (C) One (1) paint repair booth, identified as SV2-32, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-32;
 - (D) One (1) paint repair booth, identified as SV2-33, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-33; and
 - (E) One (1) paint repair booth, identified as SV2-34, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-34.
- (7) One (1) undercoating operation, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stacks SV2-UC1 and SV2-UC2; and
- (c) Plant 20: A welding and adhesive application plant, consisting of:
 - (1) One (1) adhesive application process, identified as EU-20A, constructed in the 1960s, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to general ventilation stacks GV20-6 through GV20-10; and
 - (2) One (1) sidewall welding operation, identified as EU-20B, constructed prior to 1981, consisting of twenty-four (24) welding stations, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, and exhausting to general ventilation stacks GV20-2 through GV20-5.
- (d) Plant 22: A metal shop, consisting of:

One (1) dash component production area which includes one (1) surface coating spray room, identified as GV22-3/GV22-4, constructed in the 1970s, a maximum capacity of 3.5 units per hour, using air-atomized spray application, with emissions controlled by dry filters, exhausting to stacks GV22-3 and GV22-4.

(e) Plant 28: A Formtec (Thermoforming) plant, consisting of:

- (1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and
- (2) One (1) tank cover chemical welding operation, identified as SV28-01, constructed prior to 1985, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to stack SV28-01.

(f) Plant 36: A fiberglass fabrication plant, consisting of:

- (1) Two (2) gelcoat booths, identified as GC36-1 and GC36-2, each constructed in 1986, each with a maximum capacity of 3.5 units per hour, gel applied using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV36-7;
- (2) One (1) barrier coat spray station, identified as BC36-1, constructed in 2001, a maximum capacity of 4.0 units per hour, unfilled production resins applied using non-atomized spray application, with emissions controlled by dry filters and exhausting to stack SV36-14;
- (3) Three (3) fiberglass chop booths, identified as SV36-1&2, SV36-3&4, and SV36-5&6, each constructed prior to 1985, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-1, through SV36-6;
- (4) Five (5) grinding stations, identified as GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5, each constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, and each with a 100% recirculated air exhaust air stream;
- (5) One (1) gelcoat booth, identified as GC36-3, constructed in 1994, a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stack SV36-12 and SV36-13;
- (6) Two (2) fiberglass chop booths, identified as CS36-4 and CS36-5, constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-8 and SV36-9;

(g) Plant 37: A fiberglass molding plant, consisting of:

- (1) One (1) fiberglass fabricating area, identified as CS37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;
- (2) One (1) gel coat booth, identified as GC37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

(h) Plant 39: Training Center and Overflow Service Center:

One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly plant, consisting of:

- (1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21]
- (2) 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:

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

(b) Plant 2: Final Paint

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

- (1) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1]
- (2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1] [40 CFR Part 63, Subpart M] [40 CFR Part 63, Subpart P]
- (3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-4.1] [40 CFR Part 63, Subpart M] [40 CFR Part 63, Subpart P]

(c) Plant 22: A metal shop

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:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour,

with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

- (d) Plant 26: A White glove inspection area
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- Four (4) inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using manually-applied cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]
- (e) Plant 28: Formtec/Thermoforming
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]
- (f) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- Thirteen (13) service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 and expanded in 2000, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]
- (g) Plant 31: Sewing, warehouse, white glove and cap assembly
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]
 - (2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2] [40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]
 - (3) White glove inspections using some cleaners, caulks and touch-up paint; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP] and

- (4) One (1) natural gas-fired boiler with a heat input capacity of 12.0 MMBtu/hr. [326 IAC 6-2-3]
- (h) Plant 32: R&D (Research & Development) shop and warehouse
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) one (1) R&D CNC router [326 IAC 6-3-2]
- (2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21][326 IAC 2-2][40 CFR 52 Subpart P] [326 IAC 6-3-2(d)] [326 IAC 20-25]
- (i) Plant 38: R&D machine shop and print shop
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- Three (3) printing presses (moved from Plant 45) which use low-VOC soy-based inks. [40 CFR 52.21] [326 IAC 2-2]
- (j) Plant 25: Warehouse and Tile Floor Set:
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- One (1) tile cutting operation; [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 15th 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:
- (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 the 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, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967
and
Telephone Number: 219-245-4870 (Northern Regional Office)
Facsimile Number: 219-245-4877

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

Indiana Department of Environmental Management
Compliance 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] [IC13-17-3-2] [IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a 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.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

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(c)]

- (a) 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.
- (b) 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.7 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.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 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.10 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.11 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.12 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.13 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.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 29, 1999.
- (b) Upon direct notification by IDEM, OAQ,, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.17 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 timeframe 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.
- (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. The notification shall also include the expected date of the shut down, 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.18 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 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.19 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 emission 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. 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 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 purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-1.1-1(1).

- (b) The 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do 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.22 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.

Part 2 MACT Application Submittal Requirement

C.23 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)]: Plant 1

- (a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:
- (1) One (1) dip tank coating operation, identified as SV1-5, constructed in 1991 and reconstructed in 1997, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-5;
 - (2) Two (2) surface coating booths for chassis painting, identified as SV1-3 and SV1-4, each constructed in 1991 and reconstructed in 1997, each with a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting to stacks SV1-3 and SV1-4, respectively;
 - (3) One (1) woodworking millroom, identified as D1-01, constructed in 1997, a maximum capacity of 2000 pounds of wood per hour, with emissions controlled by a baghouse, and exhausting to stack DV1-01;
 - (4) One (1) sidewall adhesive application process, identified as SV1-6, constructed in 1997, a maximum capacity of 1.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-6;
 - (5) Three (3) manual assembly lines, using caulks, sealants, cleaners, and various hand tools, identified as D1-04, each line constructed in 1997, a total maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to general ventilation vent GV1-01;
 - (6) Eighty-four (84) welding stations, constructed in 1998, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, exhausting to general ventilation vent GV1-02;

(specifically regulated insignificant activities:)

- (a) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly
- (1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P]
 - (2) 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:

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

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

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

D.1.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1, and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from surface coating booths SV1-3 and SV1-4 shall be limited by the following:

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.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

- (a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour.
- (b) Each of the Plant 1 manual assembly lines shall not exceed 2.03 pounds per hour based on a maximum process weight rate of 0.35 tons per hour each.
- (c) The welding operations shall not exceed, in aggregate, the allowable particulate emission rate of 1.02 pounds per hour based on a maximum process weight rate of 252 pounds per hour.
- (d) The insignificant metal working operation (D1-02) shall not exceed 1.02 pounds per hour based on a maximum process weight rate of 250 pounds per hour.

These pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour of (a) through (d) above 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.1.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by surface coating booths SV1-3 and SV1-4, dip tank coating operation SV1-5, and sidewall adhesive application process SV1-6, shall not exceed 3.5 pounds of VOCs per gallon of coating as delivered to the applicator, excluding water, for forced warm air dried coatings.

D.1.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of booths SV1-3 and SV1-4 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 minimizes evaporation.

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

Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from surface coating booths SV1-3 and SV1-4 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.8 Particulate Control

In order to comply with Condition D.1.3, the baghouses shall be in operation and control particulate emissions from facilities D1-01 and D1-02 at all times the respective facilities are in operation.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Operator Training Program

The Permittee shall implement an operator training program.

- (a) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.
- (c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from D1-01 when exhausting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.1.1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain records of the inspections.

- (d) To document compliance with Condition D.1.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) Plant 2: A final paint plant, consisting of:
- (1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 10 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively;
 - (2) One Full Paint Line B, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-20, SV2-21, and SV2-22, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-20, SV2-21, and SV-22, respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-23, SV2-24, SV2-25, and SV2-26, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-23A, SV2-23B, SV2-24A, SV2-24B, SV2-25A, SV2-25B, SV2-26A, and SV2-26B, respectively;
 - (3) One Full Paint Line C, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-13, SV2-14, and SV2-15, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-13, SV2-14, and SV2-15 respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-16, SV2-17, SV2-18, and SV2-19, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-16A, SV2-16B, SV2-17A, SV2-17B, SV2-18A, SV2-18B, SV2-19A, and SV2-19B, respectively;

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

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

- (4) One Full Paint Line D, constructed in 2003, consisting of:
 - (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-7 and SV2-8 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-7 and SV2-8, respectively;
 - (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-9, SV2-10, SV2-11, and SV2-12, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-9A, SV2-9B, SV2-10A, SV2-10B, SV2-11A, SV2-11B, SV2-12A, and SV2-12B, respectively;

- (5) One Full Paint Line E, constructed in 2003, consisting of:
 - (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-1 and SV2-2 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-1 and SV2-2, respectively;
 - (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-3, SV2-4, SV2-5, and SV2-6, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-3A, SV2-3B, SV2-4A, SV2-4B, SV2-5A, SV2-5B, SV2-6A, and SV2-6B, respectively;

- (6) One (1) repair area, consisting of:
 - (A) One (1) paint repair booth, identified as SV2-30, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-30;
 - (B) One (1) paint repair booth, identified as SV2-31, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-31;
 - (C) One (1) paint repair booth, identified as SV2-32, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-32;
 - (D) One (1) paint repair booth, identified as SV2-33, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-33; and

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

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

- (E) One (1) paint repair booth, identified as SV2-34, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-34.
- (7) One (1) undercoating operation, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stacks SV2-UC1 and SV2-UC2; and

(specifically regulated insignificant activities:)

(b) Plant 2: Final Paint

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

- (1) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]
- (2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]
- (3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2][40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

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

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

D.2.1 Best Available Control Technology (BACT) and Maximum Control Technology (MACT) [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 326 IAC 2-4.1, 40 CFR 52.21 and 326 IAC 2-2:

- (a) All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:
 - (1) Lacquer thinners and preparation cleaners and solvents used on motor home exteriors will be hand-wiped and contain a maximum 6.5 pounds VOC per gallon of coating as applied.
 - (2) Except as provided in (6) and (8) below, primers will be applied using high volume-low pressure (HVL) spray equipment, or the equivalent, and contain a maximum of 3.5 pounds VOC per gallon of coating as applied.

- (3) Except as provided in (6) and (8) below, base coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 6.5 pounds VOC per gallon of coating as applied.
 - (4) Except as provided in (6) and (8) below, clear coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.
 - (5) Except as provided in (6) and (8) below, sealers will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.
 - (6) As an alternative to complying with the individual VOC content limitations for base coats and clear coats, compliance may be determined by averaging the emissions from base coat and clear coat operations across affected lines. The average VOC content for the base coat/clear coat system shall be limited to less than or equal to 4.5 pounds VOC per gallon of coating as applied. This limitation is based on a ratio of two parts clear coat to one part base coat. Compliance will be demonstrated monthly based on the actual VOC content as applied of each coating and actual usage of base coats and clear coats during the month.
 - (7) Good housekeeping practices will be employed to minimize leaks, spills, and evaporative losses. These include: sealing lids on all containers not in use or in storage, the purging of guns and lines into approved containers, maintaining an organized spill response and clean-up operation, performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks, the use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling, and using aqueous, exempt solvents or citric cleaners where effective and practical.
 - (8) All coating materials, including primers, base coats, and clear coats, used in the repair booths will be applied with air-atomized spray equipment, or the equivalent.
 - (9) When necessary, motor home exteriors will be hand-wiped with cleaning solvent prior to painting.
 - (10) Collected solvents will be recycled on-site and/or off-site to recover reusable solvents and minimize waste.
 - (11) Motor homes will be undercoated with a waterborne-low VOC coating.
- (b) The surface coating operations in Partial Paint Line A and Full Paint Lines B through E shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements and the VOC emissions from insignificant natural gas combustion is equivalent to VOC emissions (from Partial Paint Line A and Full Paint Lines B through E) of less than or equal to 540.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements will satisfy the requirements of 326 IAC 2-4.1 (MACT), 40 CFR 52.21, and 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the surface coating operations 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.2.3 Volatile Organic Compounds [326 IAC 8-2-9]

Any change or modification which may increase the maximum capacity of any paint line (partial paint line A and full paint lines B through E) to greater than 35 vehicles (motor homes) per day must be approved by the OAQ before any such change may occur.

D.2.4 Particulate [326 IAC 6-3-2(d)]

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

D.2.5 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 this facility and any control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.3 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, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Operator Training Program

The Permittee shall implement an operator training program.

- (a) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.
- (c) All operators shall be given refresher training annually.

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.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain daily records of the number of vehicles painted on each paint line in that day.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) To document compliance with Condition D.2.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 20

- (c) Plant 20: Welding and adhesive application plant, consisting of:
- (1) One (1) adhesive application process, identified as EU-20A, constructed in the 1960s, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to general ventilation stacks GV20-6 through GV20-10; and
 - (2) One (1) sidewall welding operation, identified as EU-20B, constructed prior to 1981, consisting of twenty-four (24) welding stations, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, and exhausting to general ventilation stacks GV20-2 through GV20-5.

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

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

D.3.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued July 24, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the sidewall welding operation (EU-20B) shall not exceed 0.12 pounds per hour when operating at a maximum process weight rate of 3.0 pounds 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1. 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 less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 22

- (d) Plant 22: A metal shop, consisting of:
One (1) dash component production area which includes one (1) surface coating spray room, identified as GV22-3/GV22-4, constructed in the 1970s, a maximum capacity of 3.5 units per hour, using air-atomized spray application, with emissions controlled by dry filters, exhausting to stacks GV22-3 and GV22-4.

(specifically regulated insignificant activities)

- (c) Plant 22: A metal shop
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:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour, with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

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

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

D.4.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1, and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.4.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the dash production area (GV22-3/GV22-4) 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.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant baggage door assembly area and metal cutting operation (EU-22) shall not exceed 2.29 pounds per hour based on a maximum process weight rate of 0.42 tons per hour.

The pound 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.4.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the dash production area (GV22-3/GV22-4) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.4.5 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by the dash component production area (GV22-3/GV22-4) shall not exceed 3.5 pounds of VOCs per gallon of coating as delivered to the applicator, excluding water, for forced warm air dried coatings.

D.4.6 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment in the dash component production area (GV22-3/GV22-4) 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 minimizes evaporation.

D.4.7 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 GV22-3/GV22-4 and the dry filters.

Compliance Determination Requirements

D.4.8 Particulate Control

In order to comply with Condition D.4.3, the cyclone shall be in operation and control particulate emissions from facility EU-22 at all times the facility is in operation.

D.4.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.4.10 Operator Training Program

The Permittee shall implement an operator training program.

- (a) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.

- (c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.11 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.5, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.4.1 and D.4.5. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.4.10, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) To document compliance with Condition D.4.7, the Permittee shall maintain of records of any 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.

D.4.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 25 and 26

(specifically regulated insignificant activities)

- (c) Plant 26: A White glove inspection area
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using manually-applied cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P]

- (j) Plant 25: Warehouse and Tile Floor Set:
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

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

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

D.5.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.6.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the tile cutting operation 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:

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

Compliance Determination Requirements

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ,

reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.5.4 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 28

- (e) Plant 28: A Formtec (Thermoforming) plant, consisting of:
- (1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and
 - (2) One (1) tank cover chemical welding operation, identified as SV28-01, constructed prior to 1985, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to stack SV28-01.

(specifically regulated insignificant activities)

- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

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

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

D.6.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.7.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.6.2 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) Any change or modification which may increase the VOC potential to emit of the plastic dash component vinyl wrapping operation (EU-28) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.
- (b) Any change or modification which may increase the VOC potential to emit of the tank cover chemical welding operation (SV28-01) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.6.1 shall be determined

pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.6.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.6.1 and D.6.2. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.

D.6.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.1 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 does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 29

(specifically regulated insignificant activities)

- (e) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Thirteen (13) service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 and expanded in 2000, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P]

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

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

D.7.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.8.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Determination Requirements

D.7.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.7.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.7.3 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.7.1. 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 less water.
- (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 31 and Plant 32

(specifically regulated insignificant activities)

- (f) Plant 31: Sewing, warehouse, white glove and cap assembly
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P]
 - (2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P]
 - (3) White glove inspections using some cleaners, caulks and touch-up paint; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P][40 CFR Part 63, Subpart P] and
 - (4) One (1) natural gas-fired boiler with a heat input capacity of 12.0 MMBtu/hr. [326 IAC 6-2-3]
- (g) Plant 32: R&D (Research & Development) shop and warehouse
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) one (1) R&D CNC router [326 IAC 6-3-2]
 - (2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21] [326 IAC 2-2][40 CFR 52 Subpart P][326 IAC 6-3-2(d)][326 IAC 20-25]

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

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

D.8.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.9.3, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.8.2 Particulate Matter [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the particulate matter (PM) emissions from the boiler shall not exceed 0.6 pounds per MMBtu heat input.

D.8.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from SV32-1 shall be limited by the following:

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.8.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant R&D CNC router shall be limited by 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.8.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from SV32-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.8.6 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which may increase the potential VOC emissions from SV32-1 to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

D.8.7 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of SV32-1 shall comply with the provisions of 326 IAC 20-25 on or after January 1, 2002, including:

- (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

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
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 D.8.17 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 nonatomized 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.8.8 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:

- (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.8.9 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 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.8.10 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 SV32-1 and the dry filters.

Compliance Determination Requirements

D.8.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.8.12 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in Condition D.8.7 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 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.
 - (2) 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.
- (d) An alternate method approved by IDEM, OAQ.

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

D.8.13 Operator Training Program

The Permittee shall implement an operator training program.

- (a) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.

- (c) All operators shall be given refresher training annually.

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.8.14 Record Keeping Requirements

- (a) To document compliance with Condition D.8.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.8.1. 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 less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.8.7, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (c) To document compliance with Condition D.8.9, the Permittee shall maintain the following training records:
- (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) To document compliance with Condition D.8.13, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (e) In order to document compliance with Condition D.8.6, the Permittee shall keep records of the total VOC input to facility SV32-1 using the information required by (a) above.
- (f) To document compliance with Condition D.8.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.15 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.8.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.8.7 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 36 and 37

- (f) Plant 36: A fiberglass fabrication plant, consisting of:
- (1) Two (2) gelcoat booths, identified as GC36-1 and GC36-2, each constructed in 1986, each with a maximum capacity of 3.5 units per hour, gel applied using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV36-7;
 - (2) One (1) barrier coat spray station, identified as BC36-1, constructed in 2001, a maximum capacity of 4.0 units per hour, unfilled production resins applied using non-atomized spray application, with emissions controlled by dry filters and exhausting to stack SV36-14;
 - (3) Three (3) fiberglass chop booths, identified as SV36-1&2, SV36-3&4, and SV36-5&6, each constructed prior to 1985, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-1, through SV36-6;
 - (4) Five (5) grinding stations, identified as GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5, each constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, and each with a 100% recirculated air exhaust air stream;
 - (5) One (1) gelcoat booth, identified as GC36-3, constructed in 1994, a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stack SV36-12 and SV36-13;
 - (6) Two (2) fiberglass chop booths, identified as CS36-4 and CS36-5, constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-8 and SV36-9;
- (g) Plant 37: A fiberglass molding plant, consisting of:
- (1) One (1) fiberglass fabricating area, identified as CS37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;
 - (2) One (1) gel coat booth, identified as GC37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

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

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

D.9.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart WWWW. The Permittee must comply with these requirements on and after April 21, 2003.
- (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.9.2 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [40 CFR Part 63, Subpart WWWW][40 CFR 63.5805]

- (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 Part 63, Subpart WWWW:
- (1) Gelcoat booths GC36-1, GC36-2, GC36-3, GC37-1;
 - (2) Barrier coat spray station BC36-1;
 - (3) Fiberglass chop booths SV36-1&2, SV36-3&4, SV36-5&6, CS36-4, and CS36-5; and
 - (4) Fiberglass fabricating area CS37-1.
- (c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are incorporated by reference.

D.9.3 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.9.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be limited by the following:

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.9.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997 and 326 IAC 6-3-2, the allowable particulate emission rate from the grinding stations (GB36-1, GB36-2, GB36-3, GB36-4, and

GB36-5) shall not exceed 2.29 pounds per hour each when operating at a maximum process weight rate of 0.42 tons per hour each.

The pounds per hour limitations were 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.9.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP 039-7335-00017, issued on July 24, 1997 and 326 IAC 6-3-2(d), particulate from GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 has been determined to be the following:

- (a) Use of resins and gel coats that contain styrene shall be limited such that the volatile organic HAP emissions from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 - (1) 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. The emission factors used shall be 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, April 1999, 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.
- (b) 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, -- Non corrosion Resistant Filled ($\geq 35\%$ 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, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table 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

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, fluid impingement technology (FIT), resin impregnators, flow choppers, pressure-fed rollers, 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 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. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (d) 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.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup solvent.
 - (2) For VOC- and/or HAP-containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the 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.
 - (3) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.

D.9.8 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 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.9.9 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 these facilities and their control devices.

Compliance Determination Requirements

D.9.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content limitations contained in Conditions D.9.3 and D.9.4 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, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.9.11 Operator Training Program

The Permittee shall implement an operator training program.

- (a) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.
- (c) All operators shall be given refresher training annually.

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.9.12 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production- Notifications [40 CFR Part 63, Subpart WWWW][40 CFR 63.5905]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR Part 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) 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).
 - (2) 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).
 - (3) 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) All notifications, required by (a) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590

D.9.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.9.3 and D.9.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage and HAP content limits established in Conditions D.9.3 and D.9.4. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC and HAP content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC and HAP usage for each month.
- (b) To document compliance with Conditions D.9.5 and D.9.11, the Permittee shall maintain copies of the training programs and the lists of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

D.9.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.9.3 and D.9.4 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.9.15 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 from the Notification Of Compliance Status (NOCS) 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 July 21, 2005 and 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.10 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 38

(specifically regulated insignificant activities)

- (h) Plant 38: R&D machine shop and print shop
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Three (3) printing presses (moved from Plant 45) which use low-VOC soy-based inks. [40 CFR 52.21] [326 IAC 2-2]

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

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

D.10.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.10.2 Volatile Organic Compounds [326 IAC 8-5-5]

Any change or modification which may increase the total potential VOC emissions from any of the insignificant printing presses to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

Compliance Determination Requirements

D.10.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.10.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.10.4 Record Keeping Requirements

- (a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.

- (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) The total VOC usage for each month.
- (b) In order to document compliance with Condition D.10.2, the Permittee shall keep records of the total VOC input to each of the printing presses.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.10.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 39

- (h) Plant 39: Training Center and Overflow Service Center:
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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

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

D.11.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.10.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.11.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from PB39-1 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.11.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from PB39-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.11.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to Registration, issued January 16, 1989, any change or modification which may increase the VOC potential to emit of PB39-1 to greater than or equal to 25 tons per year must be approved by the OAQ before any such change may occur.

D.11.5 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 PB39-1 and the dry filters.

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

D.11.6 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators (except trainees) 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 permit

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

- (b) 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.
- (c) All operators shall be given refresher training annually.

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.11.7 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.
- (b) In order to document compliance with Condition D.11.4, the Permittee shall keep records of the total VOC input to facility PB39-1 using the information required by (a) above.
- (c) To document compliance with Condition D.11.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.11.6, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.11.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E FACILITY OPERATION CONDITIONS

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

Entire Source - for the purposes of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp

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

E.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart Mmmm][Table 12 to 40 CFR Part 63, Subpart Pppp]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) 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 in 40 CFR Part 63, Subpart Pppp. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart Pppp.
- (c) 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 paragraphs (a) and (b) of this condition.

E.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart Mmmm][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). 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 (b)(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), which include:
 - (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981, which are incorporated by reference.

E.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart P][40 CFR 63.4481][40 CFR 63.4482]

- (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 (as defined in (c) below). 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 three (3) years following 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 emission units comprise the affected source that is subject to 40 CFR Part 63, Subpart P:
- (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

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

E.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products - Notifications [40 CFR 63.3910]

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.3910(b) no later than January 2, 2005.
- (c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910(c) no later than March 1, 2008. 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) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590

E.5 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products - Notifications [40 CFR 63.4510]

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.4510(b).
- (c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510(c). 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) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590

E.6 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 from the Notification Of Compliance Status (NOCS) 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 Part 63, Subpart Mmmm 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 and 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

E.7 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 from the Notification Of Compliance Status (NOCS) 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 Part 63, Subpart PPPP 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 each standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven (27) months following the effective date of 40 CFR Part 63, Subpart PPPP and 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Monaco Coach Corporation
Source Address: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
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: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017

This form consists of 2 pages

Page 1 of 2

- 9** 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 (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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: 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: T039-7559-00017
Facility: Partial Paint Line A; Full Paint Lines B through E (Plant 2)
Parameter: VOC
Limit: The surface coating operations shall use less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total Amount of VOC used (tons)	Total Amount of VOC used (tons)	Total Amount of VOC used (tons)
	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: 400 Indiana Avenue, Wakarusa, IN 46573
 Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
 Part 70 Permit No.: T039-7559-00017
 Facilities: Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38
 Parameter: VOC
 Limit: The combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC usage	VOC usage	VOC usage
	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: 400 Indiana Avenue, Wakarusa, IN 46573
 Mailing Address: 400 Indiana Avenue, Wakarusa, IN 46573
 Part 70 Permit No.: T039-7559-00017

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Monaco Coach Corporation
Source Address: 606 Nelson's Parkway, Wakarusa, IN 46573
County: Elkhart
SIC Code: 3716
Part 70 Permit No.: T039-7559-00017
County Location: Elkhart
Permit Reviewer: ERG/BS

On December 22, 2003, the Office of Air Quality (OAQ) had a notice published at the Wakarusa Public Library located at 124 North Elkhart Street, Wakarusa, IN 46573 and in the Elkhart Truth newspaper of Elkhart, IN stating that Monaco Coach Corporation ("Monaco") had applied for Part 70 permit for the operation of a stationary multi-plant complex that assembles and paints high-quality, luxury motor homes that vary in floor plan and length. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

On January 21, 2004, Monaco submitted comments on the proposed Part 70 permit. The following is a summary of the comments and responses to those comments. Text with a line through it has been deleted and bold text has been added. The Table Of Contents has been modified, if applicable, to reflect any changes.

Comment 1:

The permit should be revised as follows:

- (1) Plant 39 should be added to this source as it is located on a contiguous and adjacent property. Plant 39 is a training center and overflow service center that was part of the former State Road 19 Complex. It consists of a R&D paint booth (used infrequently for training and overflow repairs). The booth was permitted in 1989 via the registration issued January 16, 1989.
- (2) Plant 25: Warehouse and Tile Floor Set. Plant 25 consists of insignificant tile cutting and tile grout laying. The grout laying activity is a trivial activity pursuant to 326 IAC 2-7-1(40) and the tile cutting operation is a source of insignificant particulate emissions. Note that neither activity is a source of VOC emissions.

Response to Comment 1:

Since Plant 39 existed at the time the source accepted the revised source-wide 249 tons of VOC limit, the limit has been revised to include the VOC emissions from Plant 39. Note that the multi-plant VOC limit does not include Plant 25 because it is not a source of VOC emissions.

We have added a new Section D.11 that has all rules and requirements that apply to Plant 39 and modified D.5 to incorporate Plant 25. The following changes were made in response to this comment. The Table of Contents has been updated and conditions have been renumbered as necessary.

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

Pursuant to CP 039-8662-00017, issued January 9, 1998, Monaco Coach Corporation's Nelson's Parkway Complex consists of the following plants:

- (a) Plant 1 (formerly Plant 30): Motorized recreational vehicle assembly
- (b) Plant 2: Final Paint
- (c) Plant 20: Welding and adhesive application
- (d) Plant 22: Metal shop
- (e) Plants 23 & 24: Normal maintenance operations
- (f) Plant 25: Warehouse **and Tile Floor Set**
- (g) Plant 26: White glove inspection (formerly called Undercoating)
- (h) Plant 27: Storage
- (i) Plant 28: Formtec/Thermoforming
- (j) Plant 29: Towable service center (formerly called Molds research & development)
- (k) Plant 31: Sewing, warehouse, white glove and cap assembly (formerly a paint area)
- (l) Plant 32: R&D shop and warehouse
- (m) Plant 33: Compressor building
- (n) Plant 34: Fire pump
- (o) Plant 36: Fiberglass fabrication
- (p) Plant 37: Fiberglass molding
- (q) Plant 38: R&D machine shop and print shop
- (r) Plant 39: Training Center and Overflow Service Center**
- (r s) Plant 46: Dispatch**

Since these ~~nineteen (19)~~ **twenty (20)** plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

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:
...

- (h) Plant 39: Training Center and Overflow Service Center:
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.**

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):

...

- (j) **Plant 25: Warehouse and Tile Floor Set:**
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 25 and 26

(specifically regulated insignificant activities)

- (c) **Plant 26: A White glove inspection area**
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using manually-applied cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P]

- (j) **Plant 25: Warehouse and Tile Floor Set:**
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

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

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

D.5.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.6.1, D.7.1, D.8.1, D.9.3, ~~and D.10.1~~ **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the tile cutting operation 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:

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

SECTION D.11

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 39

- (h) **Plant 39: Training Center and Overflow Service Center:**
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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

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

D.11.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.10.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.11.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from PB39-1 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.11.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from PB39-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.11.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to Registration, issued January 16, 1989, any change or modification which may increase the VOC potential to emit of PB39-1 to greater than or equal to 25 tons per year must be approved by the OAQ before any such change may occur.

D.11.5 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 PB39-1 and the dry filters.

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

D.11.6 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators (except trainees) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.**
- (b) 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.**
- (c) All operators shall be given refresher training annually.**

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.11.7 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.**
 - (1) The VOC content of each coating material and solvent used less water.**
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (3) The total VOC usage for each month.**
- (b) In order to document compliance with Condition D.11.4, the Permittee shall keep records of the total VOC input to facility PB39-1 using the information required by (a) above.**
- (c) To document compliance with Condition D.11.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (d) To document compliance with Condition D.11.6, the Permittee shall maintain**

copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.11.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 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 does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Comment 2:

The facility listed as facility A.3(b)(8) is already accounted for as facility A.4(b)(3). Please remove the duplicate reference.

Response to Comment 2:

The following changes were made in response to this comment:

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:
...

- (b) Plant 2: A final paint plant, consisting of:
....

~~(8) One (1) hand-applied final inspection area utilizing solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2.~~

Comment 3:

Add the metal working area, identified as D1-02 in a previous draft and permitted via CP 039-7335-00017, issued July 24, 1997, to the permit. Note that some changes in this condition will be addressed elsewhere in this addendum.

Response to Comment 3:

The following changes were made in response to this comment. Note that some changes in this condition will be addressed elsewhere in this addendum.

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) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly plant, consisting of:
- (1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21] [40 CFR Part 63, Subpart**

MMMM] [40 CFR Part 63, Subpart PPPP]

- (2) **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:**

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1

...

(specifically regulated insignificant activities:)

(a) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly

(1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21] **[40 CFR Part 63, Subpart MMMM] [40 CFR Part 63, Subpart PPPP]**

(2) **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:**

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

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

D.1.3

~~D.1.5~~ Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

- (a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour. The baghouse for particulate control shall be in operation at all times when D1-01 is in operation.
- (b) Each of the Plant 1 manual assembly lines shall not exceed 2.03 pounds per hour based on a maximum process weight rate of 0.35 tons per hour each.

- (c) The welding operations shall not exceed, in aggregate, the allowable particulate emission rate of 1.02 pounds per hour based on a maximum process weight rate of 252 pounds per hour.
- (d) **The insignificant metal working operation (D1-02) shall not exceed 1.02 pounds per hour based on a maximum process weight rate of 250 pounds per hour.**

D.1.8

~~D.1.10~~ Particulate Control

In order to comply with Condition D.1.5, the baghouses ~~and filter~~ shall be in operation and control particulate emissions from ~~facility~~ **facilities D1-01 and D1-02** at all times the respective ~~facility facilities~~ **is** are in operation and venting to the atmosphere.

Comment 4:

The description of Plant 29 should be revised to account for the service bays added in 2000.

Response to Comment 4:

The following changes were made in response to this comment:

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):

...

- (f) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

~~Six (6)~~ **Thirteen (13)** service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 **and expanded in 2000**, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P]

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 29

(specifically regulated insignificant activities)

(e) Plant 29: Towable service center and bay count

...

~~Six (6)~~ **Thirteen (13)** service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 **and expanded in 2000**, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

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

Comment 5:

Please include the non-regulated and insignificant fiberglass tool repair activities in Plant 37:

Response to Comment 5:

The permit contains only those insignificant activities which are specifically regulated. The Technical Support Document (TSD) contains all insignificant activities. However, the OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or TSD and its appendices that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, the OAQ acknowledges the existence of the following:

Plant 37: Fiberglass molding plant

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Fiberglass tool repair activities including grinding, patching, polishing and frame support construction, constructed prior to 1985, and exhausting through general ventilation.

Comment 6:

Monaco requests that the second sentence in Condition B.11(c) (Preventive Maintenance Plans) 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.

Response to Comment 6:

326 IAC 2-7-5(13) refers through 326 IAC 2-7-4(c) to a PMP described by 326 IAC 1-6-3. Subsection (a) of that rule lays out the minimum elements of the PMP. Subsection (b) provides that the plan "...shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner." Condition B.11(c) does not authorize the

commissioner to revise the plan. The condition states that "...the commissioner may require the Permittee to revise its PMPs...." The commissioner could require a revision PMP prior to approving it under 326 IAC 1-6-3(b) consistent with the terms of Condition B.11(c).

No changes have been made to the permit as a result of this comment.

Comment 7:

Monaco requests that Conditions B.12(h) (Emergency Provisions), B.15(a) (Deviations from Permit Requirements and Conditions), and C.21(a) (General Reporting Requirements) be revised to require, and document, the submission of deviation and compliance monitoring reports on a semi-annual, instead of a quarterly, basis. 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 IDEM has not provided any rational why more frequent reporting is necessary.

Response to Comment 7:

326 IAC 2-7-5(3)(c)(i) establishes the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. The OAQ maintains that reporting deviations every six months is not adequate to ensure continuous compliance and that the cause of any reoccurring deviation is corrected in a timely fashion. Quarterly has been determined to be a reasonable amount of time to report non-emergency deviations, rather than the shorter reporting times required by the Emergency Provisions. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

No changes have been made to the permit as a result of this comment.

Comment 8:

Monaco requests that Condition B.22(e) (Inspection and Entry) be deleted because it is not one of the listed authorizations in 326 IAC 2-7-6(2) or the reference statutes and exceeds the authority granted by that rule and those statutes.

Response to Comment 8:

Photographs are routinely taken to document conditions during an inspection, and are therefore included in 326 IAC 2-7-6(2)(C). The use of cameras or other recording, testing, or monitoring equipment for the purpose of assuring compliance with this permit, if necessary, is a reasonable extension of this documentation.

No changes have been made to the permit as a result of this comment.

Comment 9:

The version of 326 IAC 6-3-2 that was incorporated into 40 CFR Part 52, Subpart P does not specify the appropriate allowable emission rate for processes with a process weight rate less than 100 lb/hr. As a result, Monaco requests that the condition be either revised accordingly or removed.

Response to Comment 9:

The OAQ believes that the version of 326 IAC 6-3-2 that is incorporated into the SIP is

applicable to operations (that emit particulate matter) at any process weight rate, unless a process is otherwise regulated by 326 IAC 6-1. This interpretation is further supported by the revision to 326 IAC 6-3 as listed under 326 6-3-2(e)(2).

No changes have been made to the permit as a result of this comment.

Comment 10:

Condition C.5 (Fugitive Dust Emissions - 326 IAC 6-4) should contain a statement that 326 IAC 6-4-2(4) is not federally enforceable to ensure consistency with other Title V permits. Please revise accordingly.

Response to Comment 10:

The following changes have been made in response to this comment:

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.**

Comment 11:

Condition C.7 (Operation of Equipment) should be revised to indicate that the use of air pollution control equipment is only required if the emission unit is venting to the atmosphere. Please revise Condition C.7 accordingly.

Response to Comment 11:

Control equipment is required at all times a facility is in operation. This requirement is independent of the fact of whether or not a facility exhausts directly to the atmosphere because emissions, while perhaps originally directed indoors, eventually escape to the atmosphere through a building's various doors, vents, and other openings.

No changes have been made to the permit as a result of this comment.

Comment 12:

Monaco does not perform asbestos abatement projects. Therefore, Condition C.9 (Asbestos Abatement Projects) should be revised to simply state that the Permittee shall comply with the applicable requirements.

Response to Comment 12:

The following changes have been made in response to this comment:

C.9 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.

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

- ~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~
- ~~(2) If there is a change in the following:~~
- ~~(A) Asbestos removal or demolition start date;~~
- ~~(B) Removal or demolition contractor; or~~
- ~~(C) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3):~~
- ~~All required notifications shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(e) Procedures for Asbestos Emission Control~~
- ~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RAGM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) Demolition and Renovation~~
- ~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~
- ~~(g) Indiana Accredited Asbestos Inspector~~
- ~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

Comment 13:

Condition C.17 (Compliance Response Plan (CRP)) should be deleted because neither 326 IAC

2-7-5 or 2-7-6 authorize such a plan. In addition, the condition fails to recognize that a CRP does not have to be an entirely new document. To the extent that a CRP is necessary, the plan should be able to reference information contained in other documents.

Response to Comment 13:

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. The plans are fully supported by rules promulgated by the Air Pollution Control Board. 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 and FESOP 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." Under that section the permittee's 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. The second was 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 also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance 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 permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice 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 that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. 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 and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP

requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

No changes were made to the permit in response to this comment.

Comment 14:

Conditions C.21, D.1.18, D.2.12, D.3.5, D.4.13, D.5.8, D.6.5, D.7.8, D.8.15, D.9.12, and D.10.5 require the submission of summary reports: 1) within thirty (30) days of the end of the reporting period; and 2) on a quarterly basis. Neither the submission frequency or time period in which to submit the reports is specified in the underlying regulations and may be an insufficient amount of time for Monaco to comply. Therefore, the condition should be changed, where applicable, to state that the semi-annual, not quarterly, reports must be submitted within sixty (60) days of the end of the reporting period.

Response to Comment 14:

As indicated in Response to Comment 7, the OAQ has authority to require quarterly reports. The OAQ believes that thirty (30) days from the end of the quarterly reporting period is appropriate and sufficient.

No changes were made to the permit in response to this comment.

Comment 15:

The deadlines for the Permittee to comply with 40 CFR Part 63, Subpart Mmmm, Subpart Pppp, and Subpart Wwww that are listed in Conditions D.1.1(a), D.2.1(a), D.5.2(a), D.5.2(b), D.7.2(a), D.7.2(b), D.8.2(a), D.8.2(b), and D.9.1(a) conflicts with the deadlines stated in the respective federal rules. Please revise these conditions accordingly.

Response to Comment 15:

Conditions D.1.1(a), D.2.1(a), D.5.2(a), D.5.2(b), D.7.2(a), D.7.2(b), D.8.2(a), D.8.2(b), and D.9.1(a) state that the Permittee must comply with the requirements of 40 CFR Part 63, Subpart A, not Subpart Mmmm, Subpart Pppp, or Subpart Wwww on and after the respective effective dates of those NESHAPs.

As a result, these conditions do not conflict and no changes were made to the permit in response to this comment.

Comment 16:

The final version of 40 CFR Part 63, Subpart Mmmm was published in the Federal Register on January 2, 2004. As a result, Monaco requests that the OAQ add the applicable Subpart Mmmm requirements to the permit.

Likewise, the final version of 40 CFR Part 63, Subpart Wwww was published in the Federal Register on April 21, 2003. As a result, Monaco requests that the OAQ add the applicable Subpart Wwww requirements to the permit.

Response to Comment 16:

The IDEM, OAQ did not include the specific applicable requirements of 40 CFR Part 63, Subparts Mmmm and Wwww in the permit because Monaco has not informed the IDEM, OAQ of the specific compliance options it plans to meet with respect to Subparts Mmmm, Pppp, and Wwww. Following the submission of an application for a Significant Permit Modification, as required by this permit, the Part 70 permit will be subsequently revised to include the applicable

requirements of those NESHAPs.

Comment 17:

The second sentence in Condition D.1.5(a) (now renumbered as Condition D.1.3) should be deleted because it indicates that the requirement to operate the baghouse applies at all times when the unit (woodworking operation) is in operation and because it is inconsistent with Condition D.1.10. Requiring the use of baghouses when units vent indoors exceeds the regulatory requirements.

Response to Comment 17:

The second sentence in Condition D.1.5(a) is redundant as it is also stated in Condition D.1.10. However, D.1.10 incorrectly states that that the baghouse is not necessary when venting indoors. Venting inside does not exempt a unit from complying with 326 IAC 6-3-2. As a result the following changes have been made to the permit:

D.1.3

~~D.1.5~~ Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

- (a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour. ~~The baghouse for particulate control shall be in operation at all times when D1-01 is in operation.~~

D.1.8

~~D.1.10~~ Particulate Control

In order to comply with Condition D.1.5, the baghouses ~~and filter~~ shall be in operation and control particulate emissions from ~~facility facilities~~ D1-01 **and D1-02** at all times the respective ~~facility facilities~~ **is** are in operation ~~and venting to the atmosphere.~~

Comment 18:

Conditions D.1.8, D.4.4, and D.9.6 should be revised to state that the 326 IAC 6-3-2(d) requirement to operate a dry particulate filter is only applicable when the respective unit exhausts to the atmosphere. Requiring the use of filters when units vent indoors exceeds the regulatory requirements.

On a similar note, Conditions D.8.8, D.8.10, D.8.12, and D.8.14(b) should be removed as SV32-1 is an insignificant activity and can meet particulate emission limits without a control device.

Response to Comment 18:

Condition D.1.8 requires the use of baghouses at all times facilities D1-01 and D1-02 are in operation to ensure compliance with 326 IAC 6-3-2. Monaco has not provided any emissions testing data that indicates that the respective facilities can comply with 326 IAC 6-3-2 without the use of their control devices.

Conditions D.4.4 and D.9.6 require the use of dry filters at all times several spray booths are in operation. Pursuant to 326 IAC 6-3-2(d), "Surface coating, reinforced plastics composites fabricating manufacturing processes, and graphic arts manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device ..." This provision does not limit the requirement to operate control devices on surface coating equipment to the period when the equipment exhausts to the atmosphere.

Condition D.8.8 requires the use of dry filters at all times facility SV32-1 is in operation pursuant to 326 IAC 6-3-2(d). As stated above, 326 IAC 6-3-2(d) does not limit the requirement to operate control devices on surface coating equipment only when the equipment exhausts to the atmosphere; neither does it limit the requirement to significant emission units. If Monaco feels that SV32-1 qualifies for the exemption under 326 IAC 6-3-1(b)(15), then it may apply for a permit modification to reflect this. As a result, the aforementioned conditions shall remain in the permit.

No changes were made to the permit in response to these comments.

Comment 19:

Preventive Maintenance Plans (PMPs) are only required for control equipment. Therefore, Conditions D.1.9, D.2.7, D.4.7, D.8.10, D.8.12 and D.9.7 should be revised accordingly. Note that Monaco is aware of at least one other Indiana Title V permit that limits PMPs to control devices.

Response to Comment 19:

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. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. If a spray gun is not properly maintained, its transfer efficiency may be compromised and potentially increase PM emissions.

No changes were made to the permit in response to this comment.

Comment 20:

Condition D.1.13 requires quarterly inspections of the bags controlling emissions from the woodworking operations. This is excessive, unnecessary, and inconsistent with the manufacturer's instructions. Therefore, Monaco requests that the OAQ change the frequency of the inspections from "each calendar quarter" to "semi-annually."

Response to Comment 20:

Monaco has not provided sufficient information at this time to justify that quarterly baghouse

inspections are excessive and that semi-annual inspections provide adequate means of ensuring proper compliance.

No changes were made to the permit in response to this comment.

Comment 21:

Because neither 326 IAC 2-7-5 nor 326 IAC 2-7-6 authorize a "Compliance Response Plan" as mentioned previously, the references to such a plan in Condition D.1.14(a) should be deleted and the condition should be revised to state:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps shall be initiated. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced.

Response to Comment 21:

Condition D.1.14(a) shall remain unchanged for the reasons explained in Response to Comment 13.

Comment 22:

Conditions D.1.16(a), D.2.11(a), D.3.4(a), D.4.12(a), D.5.7(a), D.6.4(a), D.7.7(a), D.8.14(a), D.9.11(a), and D.10.4(a) require the Permittee to make quarterly records available with thirty (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. As a result, Monaco requests that the permit be revised to state that the Permittee has sixty (60) days to make the records available.

Response to Comment 22:

As indicated in Response to Comment 14, the OAQ believes that thirty (30) days from the end of the quarterly reporting period is appropriate and sufficient.

No changes were made to the permit in response to this comment.

Comment 23:

Conditions D.1.16(a), D.2.11(a), D.3.4(a), D.4.12(a), D.5.7(a), D.6.4(a), D.7.7(a), D.8.14(a), D.9.11(a), and D.10.4(a) require recordkeeping of the monthly solvent used. Those conditions also require that the solvent records differentiate between the solvent used as thinner and the solvent used for cleanup. There are no applicable requirements that establish the need for such records. As a result, please delete these conditions.

Response to Comment 23:

Conditions D.1.6, D.2.3, and D.4.12 limit the VOC content of several coatings, as applied by the applicator. In order to document and ensure compliance with these limits, several records are required; including records that differentiate between the amount of solvent used as a coating thinner and the amount used as a cleanup solvent.

However, records that differentiate between solvent used as cleanup and thinner are not needed in Conditions D.3.4(a), D.4.12(a), D.5.7(a), D.6.4(a), D.7.7(a), D.8.14(a), D.9.11(a), and D.10.4(a) because there is no applicable requirement. In addition, D.1.16(a)(3) and D.2.11(a)(3) are

duplicates of D.1.16(a)(2) and D.2.11(a)(2).

(Note that some changes shown are the result of comments made elsewhere in this document.)

As a result, the following changes have been made in response to this comment:

D.1.16 13 Record Keeping Requirements

(a) To document compliance with Conditions ~~D.1.3 and D.1.6~~ **D.1.1 and D.1.3**, the Permittee shall maintain records in accordance with (1) through (~~4~~ **3**) below. Records maintained for (1) through (~~4~~ **3**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions ~~D.1.3 and D.1.6~~ **D.1.1 and D.1.3**. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

~~(3) The monthly cleanup solvent usage; and~~

~~(4~~ **3**) The total VOC usage for each month.

D.2.11 8 Record Keeping Requirements

(a) To document compliance with Condition ~~D.2.3 1~~ **D.2.3 1**, the Permittee shall maintain records in accordance with (1) through (~~4~~ **3**) below. Records maintained for (1) through (~~4~~ **3**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition ~~D.2.3 1~~ **D.2.3 1**. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

~~(3) The monthly cleanup solvent usage; and~~

~~(4~~ **3**) The total VOC usage for each month.

D.3.4 Record Keeping Requirements

(a) To document compliance with Condition ~~D.3.1~~ **D.3.1**, the Permittee shall maintain records in accordance with (1) through (~~4~~ **3**) below. Records maintained for (1) through (~~4~~ **3**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content and~~ usage limits established in Condition ~~D.3.1~~ **D.3.1**. Records necessary to demonstrate compliance shall be available within 30 days if the end of

each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (+ 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

- (+ 3) The total VOC usage for each month.

D.4.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.5, the Permittee shall maintain records in accordance with (1) through (+ 3) below. Records maintained for (1) through (+ 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.4.1 and D.4.5. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.

- (+ 2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

~~(3) The monthly cleanup solvent usage; and~~

- (+ 3) The total VOC usage for each month.

D.5 74 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (+ 3) below. Records maintained for (1) through (+ 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.5.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.

- (+ 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

- ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- ~~(3) The monthly cleanup solvent usage; and~~
- (4 3) The total VOC usage for each month.

D.6.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.6.1 and D.6.2. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(3) The monthly cleanup solvent usage; and~~
 - (4 3) The total VOC usage for each month.

D.7.73 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.7.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(3) The monthly cleanup solvent usage; and~~
 - (4 3) The total VOC usage for each month.

D.8.14 Record Keeping Requirements

(a) To document compliance with Condition D.8.1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content and~~ usage limits established in Condition D.8.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

(4 3) The total VOC usage for each month.

D.9.4113 Record Keeping Requirements

(a) To document compliance with Conditions D.9.3 and D.9.4, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content and~~ usage **and HAP content** limits established in Conditions D.9.3 and D.9.4. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC **and HAP** content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage;~~

(4 3) The total VOC **and HAP** usage for each month.

~~(5) The total VOC used by BC36-1 for each month.~~

D.10.4 Record Keeping Requirements

(a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of

each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~_____ (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~_____ (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~_____ (3) The monthly cleanup solvent usage; and~~

- ~~(3)~~ (4) The total VOC usage for each month.

Comment 24:

Condition D.2.3(a)(10) states that solvents are recycled on-site and off-site. Monaco may not recycle solvents on-site. Therefore, please revise the condition to state that "...solvents will be recycled on-site and/or off-site ..."

Response to Comment 24:

While this revision is technically a revision to a BACT/MACT requirement, additional review is not necessary because the change will not result in an increase in emissions. It was/is the intent of the BACT/MACT condition to prevent the evaporation of used solvents which would produce VOC emissions. Whether the collected solvents are recycled on-site or off-site is not material.

The following changes were made in response to this comment:

D.2.31 Best Available Control Technology (BACT) and Maximum Control Technology (MACT) [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 326 IAC 2-4.1, 40 CFR 52.21 and 326 IAC 2-2:

- (a) All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:
...
 - (10) Collected solvents will be recycled on-site and/or off-site to recover reusable solvents and minimize waste.

Comment 25:

Condition D.2.11(b) requires records necessary to demonstrate compliance with Condition D.2.5. Monaco questions if 326 IAC 8-2-9 applies to these facilities because the products, while metal at times, are primarily fiberglass and they are subject to a BACT pursuant to 326 IAC 2-2. At any rate, the production of these facilities is significantly below the applicable vehicle per day threshold pursuant to 326 IAC 8-2-9; therefore, daily record keeping is onerous and unnecessary. Please revise Condition D.2.11(b) to state the following:

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain monthly

records of the number of vehicles painted at Plant 2. If monthly production exceeds 770 vehicles in any one month, the Permittee shall track the number of vehicles painted per line per month. If monthly production exceeds 350 vehicles on any single line in any single month, the Permittee shall maintain daily production records of the number of vehicles painted per line per day.

Response to Comment 25:

The vehicular production exemption of 326 IAC 8-2-9 is clear and the IDEM, OAQ believes that daily records of each production line are necessary to ensure that the production lines are exempt from 326 IAC 8-2-9. Note that Condition D.2.11(b) and D.2.5 have been renumbered as Condition D.2.8(b) and D.2.3, respectively.

No changes were made to the permit in response to this comment.

Comment 26:

Condition D.4.8 states that the cyclone must control emissions from EU-22 in order to comply with 326 IAC 6-3-2. This operation is in compliance with 326 IAC 6-3-2 without the control device. Therefore, Monaco will not accept a condition that is not consistent with the underlying regulation, and Conditions D.4.8 and D.4.11 should be deleted.

Response to Comment 26:

Monaco Coach has not provided any information in support of its claims that EU-22 can comply with the requirements of 326 IAC 6-3-2 without the use of the cyclone. As a result, the cyclone must operate at all time EU-22 is in operation to comply with 326 IAC 6-3-2.

No changes were made to the permit in response to this comment.

Comment 27:

SV32-1 is subject to the requirements of 326 IAC 20-25 because the source's potential to emit of a single HAP is greater than 10 tons per year, it manufacturers reinforced plastics composites, has an emission unit where gel coats or resins containing styrene are used in an open molding process, and the source has actual emissions greater than 3 tons per year.

Response to Comment 27:

This permit has been revised to include the requirements of 326 IAC 20-25 for SV32-1.

The following changes have been made in response to this comment:

D.8.7 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]
Pursuant to 326 IAC 20-25-3, the owners or operators of SV32-1 shall comply with the provisions of 326 IAC 20-25 on or after January 1, 2002, including:

- (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*

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
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 D.8.17 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 nonatomized 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.8.8 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:

- (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.8.9 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 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.

Compliance Determination Requirements

D.8.12 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in Condition D.8.9 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:

- (1) 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.
- (2) 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.

(d) An alternate method approved by IDEM, OAQ.

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

D.8.12 13 Operator Training Program

...

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

D.8.14 Record Keeping Requirements

...

- (b) To document compliance with Condition D.8.7, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (c) To document compliance with Condition D.8.11, the Permittee shall maintain the following training records:
 - (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.

- (b d) To document compliance with Condition D.8.4~~2~~ **13**, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (e e) In order to document compliance with Condition D.8.9 **6**, the Permittee shall keep records of the total VOC input to facility SV32-1 **using the information required by (a) above.**
- (e f) To document compliance with Condition D.8.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.15 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.8.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) **On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.8.7 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Comment 28:

There has been a misinterpretation of SSM 039-12758-00017, issued May 15, 2001. The barrier coat spray booth was not originally constructed via that approval, but rather modified with no increase in emissions. Monaco realizes that this fact is not well established in the TSD of the SSM; however, please delete Condition D.9.3(b).

Response to Comment 28:

As documented in the Addendum to the Technical Support Document for SSM 039-12758-00017, issued May 15, 2001, the less than 40 ton per year 326 IAC 2-2 limit is not necessary or appropriate for BC36-1 because the increase in emissions for this modification were not greater than 40 tons per year.

The following change has been made as a result of this comment:

D.9.3 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

- (a) Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, ~~and D.10.1~~, **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

_____ (b) _____ The total volatile organic compound (VOC) input to facility BC36-1 shall not exceed 40 tons per twelve consecutive month period with compliance determined at the end of each month. _____

_____ Compliance with this limit is equivalent to VOC emissions of less than 40 tons per year and will render the requirements of 326 IAC 2-2 (PSD) not applicable. _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

Part 70 Quarterly Report

Source Name: _____ Monaco Coach Corporation
Source Address: _____ 400 Indiana Avenue, Wakarusa, IN 46573
Mailing Address: _____ 400 Indiana Avenue, Wakarusa, IN 46573
Part 70 Permit No.: _____ T039-7559-00017
Facility: _____ BC36-1
Parameter: _____ VOC
Limit: _____ The VOC input to BC36-1 shall not exceed 40 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC usage	VOC usage	VOC usage
	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.

Comment 29:

Monaco has already submitted the MACT Notification pursuant to Subpart WWWW. As a result, please delete Condition D.9.10(a)(1).

Response to Comment 29:

The following change has been made as a result of this comment:

D.9.10 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production- Notifications [40 CFR Part 63, Subpart WWWW][40 CFR 63.5905]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR Part 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).~~

(2 1) 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).

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The name source has been changed to Permittee in Conditions C.10(c), C.16, and C.21(a).

C.10 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~Permittee source~~ **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).

2. Maximum Achievable Control Technology has been added to Condition C.23 for clarification purposes.

C.23 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).

3. Conditions B.9 and C.19 have been changed to include the correct submittal date for the Annual Compliance Certification and Annual Emission Statement.

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 ~~July 4~~ **April 15th** of each year to:

C.19 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 emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by ~~July 4~~ **April 15th** of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

4. Condition D.2.1 (originally D.2.3) has been revised for clarity.

D.2.31 Best Available Control Technology (BACT) and Maximum Control Technology (MACT) [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 326 IAC 2-4.1, 40 CFR 52.21 and 326 IAC 2-2:

- (a) All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:
- (1) Lacquer thinners and preparation cleaners and solvents used on motor home exteriors will be hand-wiped and contain a maximum 6.5 pounds VOC per gallon of coating as applied.
 - (2) Except as provided in **(6) and (8)** below, primers will be applied using high volume-low pressure (HVLP) spray equipment, or the equivalent, and contain a maximum of 3.5 pounds VOC per gallon of coating as applied.
 - (3) Except as provided in **(6) and (8)** below, base coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 6.5 pounds VOC per gallon of coating as applied.
 - (4) Except as provided in **(6) and (8)** below, clear coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.
 - (5) Except as provided in **(6) and (8)** below, sealers will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.

5. The following facility descriptions (in Sections A and D) have been revised, as follows, to correct typographical errors:

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

[326 IAC 2-7-5(15)]

...

- (c) Plant 22: A metal shop
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, an and woodworking operations:

...

- (e) Plant 28: Formtec/Thermoforming
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks ~~GV28-4~~, GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

6. As documented in the TSD, the fiberglass facilities in Plants 36 and 37 are subject to the requirements of 326 IAC 8-1-6. The corresponding BACT conditions identified in the TSD were accidentally left out of the permit. Note that quarterly reporting for this requirement is satisfied by the reporting requirement for 326 IAC 2-2; therefore, a new report is not necessary.

In addition, the TSD misinterprets the exemption of 326 IAC 20-25-3(e). While the revised 326 IAC 8-1-6 (BACT) determination issued after June 28, 1998 and before January 1, 2002 (SSM 039-12758-00017, issued May 15, 2001) exempts the affected facilities from the requirements of 326 IAC 20-25-3 and 20-25-4 (because it contains nearly identical requirements), it does not exempt the affected facilities from the requirements of 326 IAC 20-25-8 (Operator Training). Therefore, the requirements of 326 IAC 20-25-8 must be included in the permit.

As a result, the following changes have been made to the permit:

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 has been determined to be the following:

- (a) **Use of resins and gel coats that contain styrene shall be limited such that the volatile organic HAP emissions from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:**
- (1) **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. The emission factors used shall be 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, April 1999, 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.

- (b) 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, -- Non corrosion 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, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table 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

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, fluid impingement technology (FIT), resin impregnators, flow choppers, pressure-fed rollers, 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 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. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (d) 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.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup solvent.
- (2) For VOC- and/or HAP-containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

- (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the 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.
- (3) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.

D.9.8 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 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.9.7 9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.9.8 10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC **and HAP** content limitations contained in Conditions D.9.3 and D.9.4 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, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.9.9 11 Operator Training Program

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

D.9.40 12 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production- Notifications [40 CFR Part 63, Subpart WWWW][40 CFR 63.5905]

D.9.44 13 Record Keeping Requirements

(a) To document compliance with Conditions D.9.3 and D.9.4, the Permittee shall maintain records in accordance with (1) through ~~(4)~~ 3 below. Records maintained for (1) through ~~(4)~~ 3 shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content~~ and usage **and HAP content** limits established in Conditions D.9.3 and D.9.4. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC **and HAP** content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage;~~

~~(4)~~ 3 The total VOC **and HAP** usage for each month.

~~(5) The total VOC used by BC36-1 for each month.~~

(b) To document compliance with Conditions D.9.9 **5** and D.9.11, the Permittee shall maintain copies of the training programs and the lists of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

D.9.42 14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.9.3 and D.9.4 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 does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

7. 40 CFR Part 63, Subparts M MMM and P PPP (National Emission Standards for Hazardous Air Pollutants) apply to this source and numerous facilities contained therein. The following changes have been made to clarify which facilities are specifically subject to those rules, specify the compliance date for Subpart M MMM, and to consolidate the listed requirements. Specifically, 1) all potentially subject specifically regulated insignificant units now have the appropriate federal citation next to their description, 2) Subpart M MMM and P PPP language has been removed from each permit D section and added to a new permit section; Section E, and 3) the notification and permit modification application requirements associated with each Subpart are now only listed in Section D.1 (Conditions D.1.17 and D.1.18) and all other permit D sections refer to those conditions.

Given that these changes affect sizable portions of the permit D sections, and the number of revisions addressed elsewhere in this document, each revised permit D section (in its entirety) is presented below to clarify the changes.

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

...

(b) Plant 2: Final Paint

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

...

- (2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][**40 CFR Part 63, Subpart M MMM**][40 CFR Part 63, Subpart P PPP]

- (3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][**40 CFR Part 63, Subpart M MMM**][40 CFR Part 63, Subpart P PPP]

...

(g) Plant 31: Sewing, warehouse, white glove and cap assembly

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

- (1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2][**40 CFR Part 63, Subpart M MMM**][**40 CFR Part 63, Subpart P PPP**]

- (2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2][**40 CFR Part 63, Subpart M MMM**][**40 CFR Part 63, Subpart P PPP**]

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1

(a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:

...

(specifically regulated insignificant activities:)

(a) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly

- (1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21][**40 CFR Part 63, Subpart MMMM**][**40 CFR Part 63, Subpart PPPP**]
- (2) **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:**

One (1) metal working area, identified as D1-02, constructed in 1997, a maximum capacity of 250 pounds per hour, with emissions controlled by a baghouse, exhausting through general ventilation to stacks GV1-1 and GV1-2; [326 IAC 6-3-2]

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

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

~~D.1.1 General Provisions Relating to NESHAP [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 in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart MMMM.~~

~~(c) 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.1.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882] [40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

~~(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/misecpg.html>.~~

Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after three (3) years following the effective date of 40 CFR Part 63, Subpart M. ~~MMMM.~~

- ~~(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 (b)(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), which include:
 - ~~(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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.~~

D.1.3 1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, **and 38, and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, **and D.10.1, and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 2 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.1.5 3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

- (a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour. ~~The baghouse for particulate control shall be in operation at all times when D1-01 is in operation.~~
- (b) Each of the Plant 1 manual assembly lines shall not exceed 2.03 pounds per hour based on a maximum process weight rate of 0.35 tons per hour each.
- (c) The welding operations shall not exceed, in aggregate, the allowable particulate emission rate of 1.02 pounds per hour based on a maximum process weight rate of 252 pounds per hour.

- (d) The insignificant metal working operation (D1-02) shall not exceed 1.02 pounds per hour based on a maximum process weight rate of 250 pounds per hour.**

These pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour of (a) through (d) above 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 4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]~~

~~D.1.7 5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]~~

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

~~D.1.9 7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

Compliance Determination Requirements

~~D.1.10 8 Particulate Control~~

In order to comply with Condition D.1.5 3, the baghouses ~~and filter~~ shall be in operation and control particulate emissions from ~~facility facilities~~ **D1-01 and D1-02** at all times the respective ~~facility facilities~~ **is** are in operation and ~~venting to the atmosphere~~.

~~D.1.11 9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]~~

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.3 and D.1.6~~ **D.1.1 and D.1.4** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

~~D.1.12 10 Operator Training Program~~

~~D.1.13 11 Baghouse Inspections~~

An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from D1-01 when exhausting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

~~D.1.14 12 Broken or Failed Bag Detection~~

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

~~D.1.15 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products - Notifications [40 CFR 63.3910]~~

~~(a) The Permittee must submit the applicable notifications in 40 CFR 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 paragraphs (b) and (c) below:~~

~~(b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.3910(b).~~

~~(c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910(c). 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) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590~~

D.1.16 13 Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.1.3 and D.1.6~~ **D.1.1 and D.1.3**, the Permittee shall maintain records in accordance with (1) through (~~4~~ **3**) below. Records maintained for (1) through (~~4~~ **3**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions ~~D.1.3 and D.1.6~~ **D.1.1 and D.1.3**. 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 less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - ~~(3) The monthly cleanup solvent usage; and~~
 - ~~(4)~~ **(3)** The total VOC usage for each month.
- (b) To document compliance with Condition ~~D.1.42~~ **10**, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) To document compliance with Condition ~~D.1.43~~ **11**, the Permittee shall maintain records of the inspections.
- (d) To document compliance with Condition ~~D.1.9~~ **7**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.1.17 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 from the Notification Of Compliance Status (NOCS) 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 Part 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 and 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~~

D.1.18 14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) Plant 2: A final paint plant, consisting of:

...

(specifically regulated insignificant activities:)

(b) Plant 2: Final Paint

Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

- (1) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]
- (2) A paint storage and mixing area, exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][**40 CFR Part 63, Subpart MMMM**][40 CFR Part 63, Subpart PPPP]
- (3) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2][40 CFR 52.21][326 IAC 2-4.1][**40 CFR Part 63, Subpart MMMM**][40 CFR Part 63, Subpart PPPP]

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

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

~~D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 12 to 40 CFR Part 63, Subpart PPPP]~~

~~(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 12 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart PPPP.~~

~~(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: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]~~

~~(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). 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 three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP:~~

- ~~(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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.~~

~~D.2.3 1 Best Available Control Technology (BACT) and Maximum Control Technology (MACT) [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]~~

~~Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 326 IAC 2-4.1, 40 CFR 52.21 and 326 IAC 2-2:~~

- ~~(a) All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:~~
 - ~~(1) Lacquer thinners and preparation cleaners and solvents used on motor home exteriors will be hand-wiped and contain a maximum 6.5 pounds VOC per gallon of coating as applied.~~
 - ~~(2) Except as provided in (6) and (8) below, primers will be applied using high volume-low pressure (HVLP) spray equipment, or the equivalent, and contain a maximum of 3.5 pounds VOC per gallon of coating as applied.~~
 - ~~(3) Except as provided in (6) and (8) below, base coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 6.5 pounds VOC per gallon of coating as applied.~~
 - ~~(4) Except as provided in (6) and (8) below, clear coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.~~
 - ~~(5) Except as provided in (6) and (8) below, sealers will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.~~
 - ~~(6) As an alternative to complying with the individual VOC content limitations for base coats and clear coats, compliance may be determined by averaging the emissions from base coat and clear coat operations across affected lines. The~~

average VOC content for the base coat/clear coat system shall be limited to less than or equal to 4.5 pounds VOC per gallon of coating as applied. This limitation is based on a ratio of two parts clear coat to one part base coat. Compliance will be demonstrated monthly based on the actual VOC content as applied of each coating and actual usage of base coats and clear coats during the month.

- (7) Good housekeeping practices will be employed to minimize leaks, spills, and evaporative losses. These include: sealing lids on all containers not in use or in storage, the purging of guns and lines into approved containers, maintaining an organized spill response and clean-up operation, performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks, the use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling, and using aqueous, exempt solvents or citric cleaners where effective and practical.
 - (8) All coating materials, including primers, base coats, and clear coats, used in the repair booths will be applied with air-atomized spray equipment, or the equivalent.
 - (9) When necessary, motor home exteriors will be hand-wiped with cleaning solvent prior to painting.
 - (10) Collected solvents will be recycled on-site and/or off-site to recover reusable solvents and minimize waste.
 - (11) Motor homes will be undercoated with a waterborne-low VOC coating.
- (b) The surface coating operations in Partial Paint Line A and Full Paint Lines B through E shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements and the VOC emissions from insignificant natural gas combustion is equivalent to VOC emissions (from Partial Paint Line A and Full Paint Lines B through E) of less than or equal to 540.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements will satisfy the requirements of 326 IAC 2-4.1 (MACT), 40 CFR 52.21, and 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.4 2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

D.2.5 3 Volatile Organic Compounds [326 IAC 8-2-9]

D.2.6 4 Particulate [326 IAC 6-3-2(d)]

D.2.7 5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.8 6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

D.2.9 7 Operator Training Program

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

D.2.10 ~~National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products - Notifications [40 CFR 63.4510]~~

- ~~(a) The Permittee must submit the applicable notifications in 40 CFR 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 paragraphs (b) and (c) below.~~
- ~~(b) With respect to 40 CFR Part 63, Subpart PPPP, the Permittee must submit the:~~
- ~~(1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.4510(b); and~~
- ~~(2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510(c). 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).~~
- ~~(c) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590~~

D.2.11 8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3 1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.2.3 1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- ~~(3) The monthly cleanup solvent usage; and~~
- ((4 3) The total VOC usage for each month.

- (b) To document compliance with Condition D.2.5 3, the Permittee shall maintain daily records of the number of vehicles painted on each paint line in that day.
- (c) To document compliance with Condition D.2.9 7, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) To document compliance with Condition D.2.7 5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.42 9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~D.2.13 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, OAG to include information from the Notification Of Compliance Status (NOCS) 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, OAG to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart PPPP 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 (27) months following the effective date of 40 CFR Part 63, Subpart PPPP and 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

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

D.3.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38, and 39~~ shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, ~~and D.10.1 and D.11.1~~) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

...

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

D.3.4 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

(4 3) The total VOC usage for each month.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 22

(d) Plant 22: A metal shop, consisting of:

...

(specifically regulated insignificant activities)

(c) Plant 22: A metal shop
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, ~~an~~ **and** woodworking operations:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour, with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

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

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

D.4.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15,

2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3, ~~and D.10.1~~, **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

...

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

D.4.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.5, the Permittee shall maintain records in accordance with (1) through ~~(4 3)~~ below. Records maintained for (1) through ~~(4 3)~~ shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.4.1 and D.4.5. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
- ~~(4 2)~~ The amount of coating material and solvent used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- ~~(3) The monthly cleanup solvent usage; and~~
- ~~(4 3)~~ The total VOC usage for each month.

...

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plants 25 and 26

(specifically regulated insignificant activities)

- (c) Plant 26: A White glove inspection area

...

- (j) **Plant 25: Warehouse and Tile Floor Set:**
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

One (1) tile cutting operation; [326 IAC 6-3-2]

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

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

D.5.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.6.1, D.7.1, D.8.1, D.9.3, and D.10.1 and D.11.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the tile cutting operation 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.5.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart M][Table 12 to 40 CFR Part 63, Subpart P]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart M.
- (b) 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 in 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart P.
- (c) 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 paragraphs (a) and (b) of this condition.

D.5.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). 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 63.3891, the Permittee must comply with these requirements on and after three (3) years following the effective date of 40 CFR Part 63, Subpart M.
- (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 (b)(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), which include:~~
- ~~(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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.~~

~~D.5.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP][40 CFR 63.4481][40 CFR 63.4482]~~

- ~~(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). 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 three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP.~~
- ~~(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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.~~

Compliance Determination Requirements

D.5.5 3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

~~D.5.6 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; Surface Coating of Miscellaneous Metal Parts and Products - Notifications [40 CFR 63.4510] [40 CFR 63.3910]~~

~~The Permittee shall submit the appropriate notifications required by Conditions D.1.17 and D.2.16.~~

D.5.7 4 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (~~4~~ 3) below. Records maintained for (1) through (~~4~~ 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content~~ and usage limits established in Condition D.5.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(~~4~~ 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

(~~4~~ 3) The total VOC usage for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 28

- (e) Plant 28: A Formtec (Thermoforming) plant, consisting of:
- (1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and

...

(specifically regulated insignificant activities)

- (e) Plant 28: A Formtec (Thermoforming) plant, consisting of:
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, ~~GV28-4~~, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

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

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

D.6.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.7.1, D.8.1, D.9.3, ~~and D.10.1~~ **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

...

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

D.6.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (~~4~~ **3**) below. Records maintained for (1) through (~~4~~ **3**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content~~ and usage limits established in Conditions D.6.1 and D.6.2. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.

(4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

(4 3) The total VOC usage for each month.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 29

(specifically regulated insignificant activities)

(e) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

~~Six (6)~~ **Thirteen (13)** service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989 **and expanded in 2000**, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21] [326 IAC 2-2][40 CFR Part 63, Subpart M] [40 CFR Part 63, Subpart P]

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

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

D.7.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.8.1, D.9.3, ~~and D.10.1~~ **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.7.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart M] [Table 12 to 40 CFR Part 63, Subpart P]~~

~~(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart M.~~

- ~~_____ (b) _____ 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 in 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart PPPP.~~
- ~~_____ (c) _____ 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 paragraphs (a) and (b) of this condition.~~

~~D.7.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

- ~~_____ (a) _____ The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). 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 63.3891, the Permittee must comply with these requirements on and after three (3) years following the effective date of 40 CFR Part 63, Subpart MMMM.~~
- ~~_____ (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 (b)(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), which include:~~
 - ~~_____ (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.~~

~~D.7.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP][40 CFR 63.4481][40 CFR 63.4482]~~

- ~~_____ (a) _____ The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). 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 three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP.~~
- ~~_____ (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.~~

Compliance Determination Requirements

D.7.5 2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.7.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing, or obtaining from the manufacturer, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.7.6 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; Surface Coating of Miscellaneous Metal Parts and Products -- Notifications [40 CFR 63.4510] [40 CFR 63.3910]

The Permittee shall submit the appropriate notifications required by Conditions D.1.17 and D.2.16.

D.7.7 3 Record Keeping Requirements

(a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (4 3) below. Records maintained for (1) through (4 3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.7.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (4 2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

- ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

- ~~(3) The monthly cleanup solvent usage; and~~
- ~~(4 3) The total VOC usage for each month.~~

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.8 4 Reporting Requirements

...

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 31 and Plant 32

(specifically regulated insignificant activities)

- (g) Plant 31: Sewing, warehouse, white glove and cap assembly
...
(1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21][326 IAC 2-2][**40 CFR Part 63, Subpart M**][**40 CFR Part 63, Subpart P**]
(2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21][326 IAC 2-2][**40 CFR Part 63, Subpart M**][**40 CFR Part 63, Subpart P**]
...
(h) Plant 32: R&D (Research & Development) shop and warehouse
...
(1) one (1) R&D CNC router [326 IAC 6-3-2]
(2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21] [326 IAC 2-2][40 CFR 52 Subpart P][326 IAC 6-3-2(d)][**326 IAC 20-25**]

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

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

D.8.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.9.3, ~~and D.10.1~~ **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.8.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart M][Table 12 to 40 CFR Part 63, Subpart P]~~

- ~~_____ (a) _____ The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart M MMMM. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart M MMMM.~~
- ~~_____ (b) _____ 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 in 40 CFR Part 63, Subpart P PPPP. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart P PPPP.~~
- ~~_____ (c) _____ 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 paragraphs (a) and (b) of this condition.~~

~~D.8.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

- ~~_____ (a) _____ The provisions of 40 CFR Part 63, Subpart M MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). 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 63.3891, the Permittee must comply with these requirements on and after three (3) years following the effective date of 40 CFR Part 63, Subpart M MMMM.~~
- ~~_____ (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 (b)(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), which include:
 - ~~_____ (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.~~

~~D.8.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart P PPPP][40 CFR 63.4481][40 CFR 63.4482]~~

- ~~_____ (a) _____ The provisions of 40 CFR Part 63, Subpart P PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). 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 three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP:~~

- ~~(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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.~~

D.8.5 2 Particulate Matter [326 IAC 6-2-3]

D.8.6 3 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.8.7 4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

D.8.8 5 Particulate [326 IAC 6-3-2(d)]

D.8.9 6 Volatile Organic Compounds [326 IAC 8-1-6]

D.8.7 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of SV32-1 shall comply with the provisions of 326 IAC 20-25 on or after January 1, 2002, including:

- (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	60*
Shrinkage Controlled	52

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
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 D.8.17 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 nonatomized 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.8.8 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:

- (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.8.9 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 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.8.12 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in Condition D.8.7 shall be determined by one of the following:

- (a) **The manufacturer's certified product data sheet.**
- (b) **The manufacturer's material safety data sheet.**
- (c) **Sampling and analysis, using any of the following test methods, as applicable:**
 - (1) **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.**
 - (2) **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.**
- (d) **An alternate method approved by IDEM, OAQ.**

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

D.8.12 13 Operator Training Program

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

~~D.8.13 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; Surface Coating of Miscellaneous Metal Parts and Products – Notifications [40 CFR 63.4510] [40 CFR 63.3910]~~

~~The Permittee shall submit the appropriate notifications required by Conditions D.1.17 and D.2.16.~~

D.8.14 Record Keeping Requirements

(a) To document compliance with Condition D.8.1, the Permittee shall maintain records in accordance with (1) through ~~(# 3)~~ below. Records maintained for (1) through ~~(# 3)~~ shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~content and~~ usage limits established in Condition D.8.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

~~(# 2)~~ The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

~~(# 3)~~ The total VOC usage for each month.

(b) To document compliance with Condition D.8.7, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(c) To document compliance with Condition D.8.9, the Permittee shall maintain the following training records:

(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.**
- ~~(b d)~~ To document compliance with Condition D.8.4~~2~~ **13**, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- ~~(e e)~~ In order to document compliance with Condition D.8.9 **6**, the Permittee shall keep records of the total VOC input to facility SV32-1 **using the information required by (a) above.**
- ~~(e f)~~ To document compliance with Condition D.8.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(d g)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.15 Reporting Requirements

- ~~(a)~~ A quarterly summary of the information to document compliance with Condition D.8.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.8.7 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

SECTION D.9 FACILITY OPERATION CONDITIONS

...

D.9.3 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

- ~~(a)~~ Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38, and 39~~ shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, ~~and D.10.1 and D.11.1~~) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- ~~(b)~~ The total volatile organic compound (VOC) input to facility BC36-1 shall not exceed 40 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit is equivalent to VOC emissions of less than 40 tons per year and will render the requirements of 326 IAC 2-2 (PSD) not applicable.

...

D.9.7 Volatile Organic Compounds - Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 has been determined to be the following:

- (a) Use of resins and gel coats that contain styrene shall be limited such that the volatile organic HAP emissions from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 - (1) 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. The emission factors used shall be 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, April 1999, 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.
- (b) 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, -- Non corrosion Resistant Filled (\geq 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, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table 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

- (c) **Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, fluid impingement technology (FIT), resin impregnators, flow choppers, pressure-fed rollers, 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 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. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (d) **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.

- (e) **The listed work practices shall be followed:**

- (1) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup solvent.**
- (2) For VOC- and/or HAP-containing materials:**
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.**
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.**
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.**
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the 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.**
- (3) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.**

D.9.8 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 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.9.7 9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.9.8 10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC **and HAP** content limitations contained in Conditions D.9.3 and D.9.4 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, copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.9.9 11 Operator Training Program

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

D.9.4 12 National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production- Notifications [40 CFR Part 63, Subpart WWWW][40 CFR 63.5905]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR Part 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).~~
 - (2 1) 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).
 - (3 2) 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).
 - (4 3) 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.
- ...

D.9.44 13 Record Keeping Requirements

- (a) To document compliance with Conditions **D.9.3 and D.9.4**, the Permittee shall maintain records in accordance with (1) through ~~(4 3)~~ below. Records maintained for (1) through ~~(4 3)~~ shall be taken as stated below and shall be complete and sufficient to establish compliance with the ~~VOC content and usage~~ **and HAP content** limits established in Conditions **D.9.3 and D.9.4**. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The **VOC and HAP** content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(3) The monthly cleanup solvent usage;~~
 - ~~(4 3) The total VOC and HAP usage for each month.~~
 - ~~(5) The total VOC used by BC36-1 for each month.~~
- (b) To document compliance with Conditions **D.9.9 5 and D.9.11**, the Permittee shall maintain copies of the training programs and the lists of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

D.9.4214 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.9.3 and D.9.4** 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.9.4315 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 from the Notification Of Compliance Status (NOCS) 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 ~~twenty seven (27) months following the effective date of 40 CFR Part 63, Subpart WWWW~~ **July 21, 2005** and 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.10 FACILITY OPERATION CONDITIONS

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

D.10.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, ~~and 38~~, **and 39** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, ~~and D.9.3~~ **and D.11.1**) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

...

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

D.10.4 Record Keeping Requirements

- (a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through ~~(4 3)~~ below. Records maintained for (1) through ~~(4 3)~~ shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on monthly basis. **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(3) The monthly cleanup solvent usage; and~~

~~(4 3) The total VOC usage for each month.~~

- (b) In order to document compliance with Condition D.10.2, the Permittee shall keep records of the total VOC input to each of the printing presses.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 39

- (h) **Plant 39: Training Center and Overflow Service Center:**
One (1) R&D paint booth, identified as PB39-1, constructed in 1989, used for training and repair, with emissions controlled by dry filters, and exhausting to stack SV39-1.

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

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

D.11.1 Prevention of Significant Deterioration (PSD) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, 38, and 39 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit (which is identical to Conditions D.1.3, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.3 and D.10.1) is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.11.2 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from PB39-1 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.11.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from PB39-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.11.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to Registration, issued January 16, 1989, any change or modification which may increase the VOC potential to emit of PB39-1 to greater than or equal to 25 tons per year must be approved by the OAQ before any such change may occur.

D.11.5 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 PB39-1 and the dry filters.

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

D.11.6 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators (except trainees) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) 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.
- (c) All operators shall be given refresher training annually.

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.11.7 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.10.1. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.
- (b) In order to document compliance with Condition D.11.4, the Permittee shall keep records of the total VOC input to facility PB39-1.
- (c) To document compliance with Condition D.11.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.11.6, the Permittee shall maintain copies of the training program and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.11.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 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 does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E FACILITY OPERATION CONDITIONS

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

Entire Source - for the purposes of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp

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

E.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart Mmmm][Table 12 to 40 CFR Part 63, Subpart Pppp]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified in 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) 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 in 40 CFR Part 63, Subpart Pppp. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart Pppp.
- (c) 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 paragraphs (a) and (b) of this condition.

E.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart Mmmm][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (c) below). 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 (b)(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), which include:
- (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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981, which are incorporated by reference.

E.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP][40 CFR 63.4481][40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (c) below). 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 three (3) years following the effective date of 40 CFR Part 63, Subpart PPPP.
- (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 emission units comprise the affected source that is subject to 40 CFR Part 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 Clean Air Act, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

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

E.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products - Notifications [40 CFR 63.3910]

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.3910(b) no later than January 2, 2005.
- (c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910(c) no later than March 1, 2008. 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) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590

E.5 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products - Notifications [40 CFR 63.4510]

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.4510(b).
- (c) The Permittee must submit the Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510(c). 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) All notifications, required by (a) through (c) above, must 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 Jackson Boulevard
Chicago, Illinois 60604-3590**

E.6 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 from the Notification Of Compliance Status (NOCS) 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 Part 63, Subpart Mmmm 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 and 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**

E.7 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 from the Notification Of Compliance Status (NOCS) 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 Part 63, Subpart Pppp 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 each standard.**
- (b) The significant permit modification application shall be submitted no later than twenty-seven (27) months following the effective date of 40 CFR Part 63, Subpart Pppp and 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**

8. The Emission Statement language has changed because of revision to the 326 IAC 2-6 rule. The changes are as follows.

C.19 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 emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15th 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 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 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 January 1 and ending December 31. 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)~~ **2-1.1-1(1)**.

~~(e)~~**(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.

9. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

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 Address: 400 Indiana Avenue, Wakarusa, IN 46573
County: Elkhart
SIC Code: 3716, 3792, 3083, 3081, and 2752
Part 70 Permit No.: T039-7559-00017
County Location: Elkhart
Permit Reviewer: ERG/BS

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Monaco Coach Corporation ("Monaco") relating to the operation of a multi-plant complex that assembles and paints high-quality, luxury motor homes that vary in floor plan and length.

The attached permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the New Source Review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Source Definition

Pursuant to CP 039-8662-00017, issued January 9, 1998, Monaco Coach Corporation's Nelson's Parkway/400 Indiana Avenue Complex consists of the following plants:

- (a) Plant 1 (formerly Plant 30): Motorized recreational vehicle assembly
- (b) Plant 2: Final Paint
- (c) Plant 20: Welding and adhesive application
- (d) Plant 22: Metal shop
- (e) Plants 23 & 24: Normal maintenance operations
- (f) Plant 25: Warehouse
- (g) Plant 26: White glove inspection (formerly called Undercoating)
- (h) Plant 27: Storage
- (i) Plant 28: Formtec/Thermoforming
- (j) Plant 29: Towable service center (formerly called Molds research & development)
- (k) Plant 31: Sewing, warehouse, white glove and cap assembly (formerly a paint area)
- (l) Plant 32: R&D (Research & Development) shop and warehouse

- (m) Plant 33: Compressor building
- (n) Plant 34: Fire pump
- (o) Plant 36: Fiberglass fabrication
- (p) Plant 37: Fiberglass molding
- (q) Plant 38: R&D machine shop and print shop
- (r) Plant 46: Dispatch

Since these nineteen (19) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

Note that:

- (1) Plant 45 is no longer at the source, it was sold and some unsold facilities were moved to Plant 38;
- (2) Plants 25, 26, 27, 29, 31, 32 and 38 consist entirely of insignificant activities; and
- (3) Plants 23, 24, 33, 34, and 46 are not sources of emissions or are sources that consist only of trivial activities; therefore, these plants are not discussed further and are not identified in the permit.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Plant 1 (formerly Plant 30): A motorized recreational vehicle assembly plant, consisting of:
 - (1) One (1) dip tank coating operation, identified as SV1-5, constructed in 1991 and reconstructed in 1997, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-5;
 - (2) Two (2) surface coating booths for chassis painting, identified as SV1-3 and SV1-4, each constructed in 1991 and reconstructed in 1997, each with a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting to stacks SV1-3 and SV1-4, respectively;
 - (3) One (1) woodworking millroom, identified as D1-01, constructed in 1997, a maximum capacity of 2000 pounds of wood per hour, with emissions controlled by a baghouse, and exhausting to stack DV1-01;
 - (4) One (1) sidewall adhesive application process, identified as SV1-6, constructed in 1997, a maximum capacity of 1.5 units per hour, with emissions uncontrolled, and exhausting to stack SV1-6;
 - (5) Three (3) manual assembly lines, using caulks, sealants, cleaners, and various hand tools, identified as D1-04, each line constructed in 1997, a total maximum

capacity of 3.5 units per hour, with emissions uncontrolled, and exhausting to general ventilation vent GV1-01;

- (6) Eighty-four (84) welding stations, constructed in 1998, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, exhausting to general ventilation vent GV1-02;
- (b) Plant 2: A final paint plant, consisting of:
- (1) One (1) Partial Paint Line A, constructed in 1997 and reconstructed in 2003, consisting of one (1) primer/basecoat booth, one (1) clearcoat booth, and one (1) clearcoat/bake booth, identified as SV2-27, SV2-28, and SV2-29, respectively, an aggregate maximum capacity of 10 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-27, SV2-28, and SV2-29, respectively;
 - (2) One Full Paint Line B, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-20, SV2-21, and SV2-22, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-20, SV2-21, and SV-22, respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-23, SV2-24, SV2-25, and SV2-26, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-23A, SV2-23B, SV2-24A, SV2-24B, SV2-25A, SV2-25B, SV2-26A, and SV2-26B, respectively;
 - (3) One Full Paint Line C, constructed in 1997 and reconstructed in 2003, consisting of:
 - (A) One (1) slideout paint and clear booth, one (1) seal and base booth, and one (1) paint stripe booth, identified as SV2-13, SV2-14, and SV2-15, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-13, SV2-14, and SV2-15 respectively;
 - (B) One (1) prep and repair booth, one (1) clear and bake booth, one (1) sand and repair station, and one (1) reclear and bake booth, identified as SV2-16, SV2-17, SV2-18, and SV2-19, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-16A, SV2-16B, SV2-17A, SV2-17B, SV2-18A, SV2-18B, SV2-19A, and SV2-19B, respectively;
 - (4) One Full Paint Line D, constructed in 2003, consisting of:

- (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-7 and SV2-8 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-7 and SV2-8, respectively;
 - (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-9, SV2-10, SV2-11, and SV2-12, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-9A, SV2-9B, SV2-10A, SV2-10B, SV2-11A, SV2-11B, SV2-12A, and SV2-12B, respectively;
- (5) One Full Paint Line E, constructed in 2003, consisting of:
- (A) One (1) primer/basecoat booth and one (1) repair and stripe booth, identified as SV2-1 and SV2-2 respectively, a maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-1 and SV2-2, respectively;
 - (B) One (1) slideout booth, one (1) repair and clear booth, one (1) sand and repair station, and one (1) reclear booth, identified as SV2-3, SV2-4, SV2-5, and SV2-6, respectively, an aggregate maximum capacity of 5 units (motor homes) per day, using HVLP spray equipment or its equivalent, with emissions controlled by dry filters, exhausting to stacks SV2-3A, SV2-3B, SV2-4A, SV2-4B, SV2-5A, SV2-5B, SV2-6A, and SV2-6B, respectively;
- (6) One (1) repair area, consisting of:
- (A) One (1) paint repair booth, identified as SV2-30, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-30;
 - (B) One (1) paint repair booth, identified as SV2-31, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-31;
 - (C) One (1) paint repair booth, identified as SV2-32, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-32;
 - (D) One (1) paint repair booth, identified as SV2-33, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-33; and
 - (E) One (1) paint repair booth, identified as SV2-34, constructed in 2003, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV2-34.

- (7) One (1) undercoating operation, constructed in 1998, a maximum capacity of 3.5 units per hour, using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stacks SV2-UC1 and SV2-UC2; and
- (c) Plant 20: A welding and adhesive application plant, consisting of:
- (1) One (1) adhesive application process, identified as EU-20A, constructed in the 1960s, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to general ventilation stacks GV20-6 through GV20-10; and
 - (2) One (1) sidewall welding operation, identified as EU-20B, constructed prior to 1981, consisting of twenty-four (24) welding stations, with a maximum capacity of 3.0 pounds of wire per station per hour, with emissions uncontrolled, and exhausting to general ventilation stacks GV20-2 through GV20-5.
- (d) Plant 22: A metal shop, consisting of:
One (1) dash component production area which includes one (1) surface coating spray room, identified as GV22-3/GV22-4, constructed in the 1970s, a maximum capacity of 3.5 units per hour, using air-atomized spray application, with emissions controlled by dry filters, exhausting to stacks GV22-3 and GV22-4.
- (e) Plant 28: A Formtec (Thermoforming) plant, consisting of:
- (1) One (1) plastic dash component vinyl wrapping operation, identified as EU-28, constructed prior to 1985, a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stack GV28-4; and
 - (2) One (1) tank cover chemical welding operation, identified as SV28-01, constructed prior to 1985, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting to stack SV28-01.
- (f) Plant 36: A fiberglass fabrication plant, consisting of:
- (1) Two (2) gelcoat booths, identified as GC36-1 and GC36-2, each constructed in 1986, each with a maximum capacity of 3.5 units per hour, gel applied using air-atomized spray equipment, with emissions controlled by dry filters, exhausting to stack SV36-7;
 - (2) One (1) barrier coat spray station, identified as BC36-1, constructed in 2001, a maximum capacity of 4.0 units per hour, unfilled production resins applied using non-atomized spray application, with emissions controlled by dry filters and exhausting to stack SV36-14;
 - (3) Three (3) fiberglass chop booths, identified as SV36-1&2, SV36-3&4, and SV36-5&6, each constructed prior to 1985, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-1, through SV36-6;
 - (4) Five (5) grinding stations, identified as GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5, each constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, and each with a 100% recirculated air exhaust air stream;
 - (5) One (1) gelcoat booth, identified as GC36-3, constructed in 1994, a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stack SV36-12 and SV36-13;

- (6) Two (2) fiberglass chop booths, identified as CS36-4 and CS36-5, constructed in 1994, each with a maximum capacity of 3.5 units per hour, with emissions controlled by dry filters, exhausting to stacks SV36-8 and SV36-9;
- (g) Plant 37: A fiberglass molding plant, consisting of:
 - (1) One (1) fiberglass fabricating area, identified as CS37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, using air-atomized spray equipment, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;
 - (2) One (1) gel coat booth, identified as GC37-1, constructed prior to 1985, a maximum capacity of 1.0 unit per hour, with emissions controlled by dry filters, and exhausting through general ventilation to stacks GV37-1 and GV37-2;

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating 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) Plant 1: (formerly Plant 30) Motorized recreational vehicle assembly
 - (1) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. [326 IAC 2-2] [40 CFR 52.21]
 - (2) 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:
 - One (1) metal working area, identified as D1-02, constructed in 1991, a maximum capacity of 250 pounds per hour, with emissions controlled by a cartridge filter, exhausting indoors;
- (b) Plant 2: Final Paint
 - (1) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (A) Two (2) paint prep areas, utilizing solvents, cleaners, composites, and hand-sanding equipment, constructed in 1997 and reconstructed in 2003, a total maximum capacity of 4.5 units per hour, with emissions controlled by filtered exhaust identified as D2-1, exhausting through general ventilation stacks GV2-3 through GV2-7; [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1]
 - (B) A paint storage and mixing area exhausting to vents SV2-15 and SV2-16. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart PPPP]

- (C) One (1) final inspection area utilizing hand-applied solvents, cleaners, sealants, adhesives, and paint, constructed in 1998, a maximum capacity of 3.5 units per hour, with emissions uncontrolled, exhausting through general ventilation to stacks GV2-1 and GV2-2. [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-4.1][40 CFR Part 63, Subpart PPPP]
- (2) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (A) Two 2.0 MMBtu/hr, one (1) 6.6 MMBtu/hr, two (2) 4.4 MMBtu/hr, and twelve (12) 3.2 MMBtu/hr air-make-up units;
 - (B) One (1) air rotation unit, one (1) natural gas fired air make-up unit and two (2) natural gas fired unit heaters located in the final paint production area with maximum heat input rates of 0.4, 7.425, 0.1 and 0.1 million British thermal units per hour, respectively;
 - (C) One (1) natural gas fired air make-up unit with a maximum heat input rate of 3.85 million British thermal units per hour located in the bay area;
 - (D) Two (2) natural gas fired air make-up units with a maximum heat input rate of 3.85 million British thermal units per hour, each, located in the final finish area;
 - (E) Two (2) natural gas fired heaters located in the large repair booth, each with a maximum heat input rate of 2.5 million British thermal units per hour, and two (2) natural gas fired heaters located in the single repair booths (one per booth), each with a maximum heat input rate of 3.24 million British thermal units per hour;
 - (F) Twelve (12) natural gas fired heaters located in the full paint booths (two per booth) and twelve (12) natural gas fired heaters located in the partial paint booths (two per booth), each with a maximum heat input rate of 2.97 million British thermal units per hour;
 - (G) One (1) natural gas fired air make-up unit located in the undercoating area, with a maximum heat input rate of 1.0 million British thermal units per hour;
 - (H) Two (2) natural gas fired unit heaters located in the office and break room area, each with a maximum heat input rate of 0.1 million British thermal units per hour;
 - (I) Two (2) natural gas fired infra-red unit heaters located in the undercoating area, each with a maximum heat input rate of 0.04 million British thermal units per hour;
 - (J) Two (2) 2.0 MMBtu/hr natural gas fired air make-up units;
- (c) Plant 22: A metal shop
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, an woodworking operations:

One (1) baggage door assembly area and metal cutting operation, identified as EU-22, constructed prior to 1989, a maximum capacity of 0.42 tons per hour, with emissions controlled by a cyclone, exhausting through general ventilation to stacks GV22-1 and GV22-2; [326 IAC 6-3-2]

- (d) Plant 25: Warehouse
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

Five (5) 150,000 Btu per hour space heaters, one (1) 50,000 Btu per hour infra-red heaters, and two (2) 80,000 Btu per hour office furnaces.

- (e) Plant 26: A White glove inspection area
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) manual inspection bays, used to perform final vehicle inspection, constructed prior to 1981, a maximum capacity of 3.5 units per hour, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV26-1 through GV26-4; [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart MMMM][40 CFR Part 63, Subpart PPPP]

- (f) Plant 27: Storage
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

One (1) 300,000 Btu per hour space heater.

- (g) Plant 28: Formtec/Thermoforming

- (1) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Four (4) plastic sheet component assembly (thermal forming) operations, identified as GV28-1, GV28-2, GV28-3, and GV28-8, constructed in 1979, 1980, 1983, and 1983, respectively, each with a maximum capacity of 7000 units per year, with emissions uncontrolled, and exhausting to stacks GV28-1, GV28-1, GV28-2, GV28-3, and GV28-8, respectively. Note that GV28-2 was converted to a rotary station unit in 2003; [40 CFR 52.21] [326 IAC 2-2]

- (2) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

One (1) 2.0 MMBtu/hr natural gas-fired air make-up unit.

- (h) Plant 29: Towable service center and bay count
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25

lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Six (6) service bays used to perform manual vehicle inspection and repairs on customer owned units, constructed prior to 1989, using some general cleaners and touch-up paint, with emissions exhausting through general ventilation to stacks GV29-1 through GV29-4. [40 CFR 52.21][326 IAC 2-2][40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P]

- (i) Plant 31: Sewing, warehouse, white glove and cap assembly
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Fiberglass cap windshield set operations and repairs using adhesives and paints; [40 CFR 52.21] [326 IAC 2-2]
 - (2) Sewing operations using some adhesives and cleaners; [40 CFR 52.21] [326 IAC 2-2]
 - (3) White glove inspections using some cleaners, caulks and touch-up paint; [40 CFR 52.21] [326 IAC 2-2] [40 CFR Part 63, Subpart M][40 CFR Part 63, Subpart P] and
 - (4) One (1) natural gas-fired boiler with a heat input capacity of 12.0 MMBtu/hr. [326 IAC 6-2-3]

Note that pursuant to a February 5, 2002 site visit, previously existing paint booths B31-1, B31-2, and B31-3 were removed from the source.

- (j) Plant 32: R&D (Research & Development) shop and warehouse
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) one (1) R&D CNC router [326 IAC 6-3-2]
 - (2) one (1) R&D fiberglass spray booth, identified as SV32-1, with emissions controlled by dry filters [40 CFR 52.21][326 IAC 2-2][40 CFR 52, Subpart P][326 IAC 6-3-2(d)]
- (k) Plant 38: R&D machine shop and print shop
Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

Three (3) printing presses (moved from Plant 45) which use low-VOC soy-based inks. [40 CFR 52.21] [326 IAC 2-2]

Note that the three (3) printing presses located in Plant 38 were previously located in

Plant 45.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) OP 20-01-81-0431, issued October 27, 1977,
- (b) OP 20-02-81-0473, issued March 13, 1978,
- (c) OP 20-02-81-0472, issued February, 15, 1978,
- (d) Exemption No. 20-02-81-0473, issued March 11, 1981,
- (e) Registration No. 20-02-81-0472, issued March 11, 1981,
- (f) Registration No. 20-01-81-0431, issued March 11, 1981,
- (g) R, registration number was not provided, issued May 31, 1983,
- (h) R, registration number was not provided, issued January 16, 1989,
- (i) R, registration number was not provided, issued February 2, 1989,
- (j) PC (20) 1729, issued February 21, 1989,
- (k) R, registration number not available, issued November, 27, 1989,
- (l) PC (20) 1836, issued on April 4, 1991,
- (m) CP 039-2036-00017, issued November 19, 1991,
- (n) CP 039-2181-00017, withdrawn December 5, 1991,
- (o) CP 039-3087-00017, issued February 24, 1993,
- (p) CP 039-7335-00017, issued July 24, 1997, (which superseded all prior permits)
- (q) CP 039-8662-00017, issued January 9, 1998,
- (r) CP 039-10912-00017, issued June 30, 1999,
- (s) SSM 039-12758-00017, issued on May 15, 2001,
- (t) E 039-15302-00017, issued May 30, 2002, and
- (u) PSD SSM 039-15620-00017, issued December 11, 2002.

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

The following conditions from previous approvals have been revised and incorporated, as indicated, into this Part 70 permit:

- (a) Condition 12(f) from CP 039-7335-00017, issued July 24, 1997:
Pursuant to 326 IAC 6-3-2, the allowable PM emissions from the Plant 30 welding operations shall not exceed 0.57 pounds per hour based on a process throughput of 105 pounds per hour.

Revised condition:

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the Plant 30 welding operations shall not exceed 1.02 pounds per hour when operating at a maximum process weight of 252 pounds per hour.

Reason revised:

The allowable particulate emission rate has been revised to reflect a revised process weight rate.

- (b) Condition 8(d) from CP 039-7335-00017, issued July 24, 1997:
Pursuant to 326 IAC 6-3-2, the dust collector, controlling emissions from the assembly line, shall not exceed 2.03 pounds per hour based on a process throughput of 0.35 tons per hour.

Revised condition:

Pursuant to 326 IAC 6-3-2, the particulate emissions from each of the Plant 1 assembly lines shall not exceed 2.03 pounds per hour when operating at a maximum process weight rate of 0.35 tons per hour.

Reason revised:

Particulate emissions produced from the assembly lines are the result of routing and cutting with hand tools. As a result, the particulate emissions are not great enough to require the installation of a dust collector so one was not installed.

- (c) Conditions 8(a) through 8(e) from CP 039-7335-00017, issued July 24, 1997:
The total VOC input to the dip tank, two (2) spray booths, and adhesive application and assembly operations located at Plant 30 (now identified as Plant 1) shall be limited to 57.5 tons per twelve (12) consecutive month period.

The total VOC input to the three (3) paint booths and the west side-out assembly/final inspection area located at Plant 31 shall be limited to 34.5 tons per twelve (12) consecutive month period.

The total VOC input to the five (5) fiberglass chop booths and five (5) grinding booths located at Plant 36 shall be limited to 103.2 tons per twelve (12) consecutive month period.

The total VOC input to the facilities located at Plants 26 and 37 shall be limited to 23.0 tons per twelve (12) consecutive month period.

The total VOC input to the rest of the source (Plants 20, 22, 28, 29, 38 and 45) shall be limited to 10.3 tons per twelve (12) consecutive month period.

Revised condition:

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38 shall not exceed 249 tons per twelve consecutive month period with compliance determined

at the end of each month. Compliance with this limit will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Reason revised:

The VOC input limits from CP 039-7335-00017, issued July 24, 1997 are equivalent to total VOC emissions of 228.5 tons per year and were included to limit the source-wide VOC emissions to less than 250 tons per year; therefore, classifying the source as a PSD minor source. The 228.5 ton per year figure was obtained by multiplying the 250 ton per year PSD threshold by a factor of 11/12 to ensure compliance. Pursuant to SSM 039-12758-00017, issued May 15, 2001, this 228.5 ton per year limit was increased to the legally afforded 249 ton per year limit at the source's request to allow for maximum operational flexibility and facilitate compliance determination. This limit has been revised via this Part 70 permit to include Plant 32 because the emission units in Plant 32 existed at the time CP 039-7335-00017 was issued but were not included in the limit. Note that the limit is for 249 tons (instead of "less than 250 tons") to account for VOC emissions from the insignificant activities at the respective plants.

- (d) Condition D.1.1(l) from PSD SSM 039-15620-00017, issued December 11, 2002: The surface coating operations shall use less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC usage limit, in conjunction with the usage of low VOC/high solids coatings and high transfer application methods, and the VOC emissions from the insignificant natural gas fired air-make-up units, has been incorporated to limit the potential to emit VOC from Plant 2 to less than 540.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Revised Condition:

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, and as revised by this Part 70 permit, the surface coating operations in Partial Paint Line A and Full Paint Lines B through E shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit, VOC emissions from insignificant natural gas fired air-make-up units, the use of low VOC/high solids coatings, and required high transfer application methods, is equivalent to VOC emissions (from Partial Paint Line A and Full Paint Lines B through E) of less than or equal to 540.4 tons per year.

Reason revised:

PSD SSM 039-15620-00017, issued December 11, 2002, was issued for the reconstruction of the partial and full paint lines in Plant 2. There are other surface coating operations at Plant 2, namely the booths in the repair area and the undercoating area. As a result, the structure of the 539 ton per year input limit has been revised via this Part 70 permit to clarify that limit only applies to the partial paint and full paint lines in Plant 2. Note that the revised limit does not result in an increase in allowable emissions from the respective operations.

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

- (a) All construction conditions from all previously issued permits.

Reason not incorporated:

All previously permitted facilities have already been constructed; therefore, the

construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) All existing conditions pertaining to paint booths B31-1, B31-2, and B31-3.

Reason not incorporated:

These booths, previously located at Plant 31, permitted via CP 039-7335-000017, issued July 24, 1997, were removed from the source. Therefore, booths B31-1, B31-2, and B31-3 are not included in this Part 70 permit.

- (c) Condition 8(d) from CP 039-7335-00017, issued July 24, 1997:
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the dust collector, controlling emissions from the woodworking/fiberglass operation, shall not exceed 2.29 pounds per hour based on a process throughput of 0.42 tons per hour.

Reason not incorporated:

The woodworking/fiberglass operation has been removed.

- (d) Condition 14 from CP 039-7335-00017, issued July 24, 1997:
Pursuant to 326 IAC 7-1.1, the sulfur dioxide emissions from the 12.0 MMBtu/hr boiler, located in Plant 31, shall not exceed 0.5 lb/MMBtu heat input.

Reason not incorporated:

The boiler does not have the capacity to burn fuel oil, has a SO₂ PTE less than 25 tons per year, and is therefore not subject to the requirements of 326 IAC 7-1.1.

- (e) Condition 8(c) from CP 039-7335-00017, issued July 24, 1997:
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the metal working operation (D1-02) shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour.

Reason not incorporated:

Facility D1-02 is not subject to the requirements of 326 IAC 6-3-2 because it is not a source of particulate emissions; it exhausts indoors and can not exhaust to a stack.

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.

A timely Part 70 application for the purposes of this review was received on December 12, 1996.

This Part 70 permit contains provisions intended to satisfy the requirements of the construction permit rules.

A Notice Of Completeness letter was mailed to the source on January 17, 1997.

Emission Calculations

The calculations submitted by the applicant 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
Toluene	greater than 10
Xylene	greater than 10
Hexane	greater than 10
Ethylbenzene	greater than 10
MEK	greater than 10
MIBK	greater than 10
Methyl Methacrylate	greater than 10
1,1,1 Trichloroethane	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and VOC are equal to or greater than 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)) of 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)) of any 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, fugitive 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	7.0
SO ₂	not reported
VOC	252
CO	not reported
NO _x	not reported
HAP	not reported

Potential to Emit After Issuance

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

Limited Potential to Emit (tons/year)							
Process/facility	PM ^(a)	PM-10 ^(a)	SO ₂ ^(d)	VOC	CO ^(d)	NO _x ^(d)	HAPs
Plant 2	Und.	Und.	0.34	579.3 ^(b)	47.8	56.9	greater than 10/25 ^(c)
Plant 1	49.3	49.3	0	less than 249 ^(f)	0	0	
Plant 20	2.42	2.42	0		0	0	
Plant 22	10.0	10.0	0		0	0	
Plant 26	Neg.	Neg.	0		0	0	
Plant 28	Neg.	Neg.	0.01		0.7	0.9	
Plant 29	Neg.	Neg.	0		0	0	
Plants 36 and 37	10.1	10.1	0		0	0	
Plant 38	Und.	Und.	0		0	0	
Plants 31 and 32 **	Und.	Und.	0.03		4.4	5.3	
Plants 25 and 27 **	Und.	Und.	0.01		Und.	0.37	
Fugitive Emissions	Und.	Und.	0	Neg.	0	0	
Total Emissions	less than 100 ^(e)	less than 100 ^(e)	0.04	less than 828.3	53.4	63.6	

Neg. - Negligible; emissions are less than 0.01 tons per year.

Unless otherwise footnoted, the emissions listed in the table above are based on the facility's respective maximum capacity, control efficiency (if applicable), and 8760 hours per year, since no federal or 326 IAC limits are applicable.

** Consist entirely of insignificant emission units.

Und. - Undetermined

(a) The PM/PM10 PTE listed is equal to the sum of the applicable 326 IAC 6-3-2 pound per hour limits at 8760 hours per year (unless otherwise footnoted). See State Rule Applicability - 326 IAC 6-3-2 for the specific 326 IAC 6-3-2 limitations. Control

devices must be in operation at all times to ensure compliance with 326 IAC 6-3-2.

(b) Pursuant to PSD SSM 039-15620-00017, and revised by this permit, Partial Paint Line A and Full Paint Lines B through E (in Plant 2) shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. The estimated VOC PTE of the natural gas-fired units is 1.4 tons per year and the VOC PTE of the final inspection, undercoating and paint prep areas is 38.9 tons per year. Therefore, the aggregate limited VOC PTE of Plant 2 is 579.3 tons per year ($539 + 1.4 + 38.9 = 579.3$).

(c) The source-wide HAP PTE is greater than 25 tons per year. A more precise figure is not provided because HAP emissions are not specifically limited. However, note that several facilities in Plant 2 are subject to the requirements of 326 IAC 2-4.1.

(d) SO_2 , CO, and NO_x emissions result from the combustion of natural gas in the various combustion units located throughout the plants.

(e) The source-wide PM/PM10 emissions are estimated to be less than 100 tons per year. A more precise figure is not provided because compliance with 326 IAC 6-3-2 is expected with the use of baghouses, cyclones, and dry filters; all of which must be in operation when the respective facilities are in operation.

(f) Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance attainment
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 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (b) Elkhart County has been classified as attainment or unclassifiable for PM-10, SO_2 , NO_2 , CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (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, 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) The twelve (12.0) million Btu per hour boiler, located in Plant 31, is not subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generation Units) because it was constructed prior to 1989.
- (b) The printing presses located in Plant 38 are not subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing) because they are not publication rotogravure printing presses as defined in 40 CFR 60.431.
- (c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (d) The printing presses located in Plant 38 are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry) because they are not publication or packaging rotogravure printing presses or wide-web flexographic printing presses as defined in 40 CFR 63.822.
- (e) The printing presses located in Plant 38 are not subject to 326 IAC 14, 40 CFR Part 63 Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and other Web Coating) because, pursuant to 40 CFR 63.3300, they are lithographic offset presses.
- (f) The printing presses located in Plant 38 are not subject to 326 IAC 14, 40 CFR Part 63 Subpart OOOO (National Emission Standards for Hazardous Air Pollutants (NESHAPs): Printing, Coating, and Dying of Fabrics and Other Textiles) because they are used to print on paper; which is not a fabric or textile as defined in 40 CFR 63.4371.
- (g) The surface coating operations in Plant 1 (SV1-3, SV1-4, and SV1-5, and SV1-6) and associated activities in Plants 26, 29, and 31 are subject to the requirements of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants - Surface Coating of Miscellaneous Metal Parts and Products) because they are located at a source which is a major source of HAPs and are predominantly used for the surface coating of metal parts and products in motorhomes. A copy of the MACT is available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Note that the surface coating operations fall under the "general use" coating subcategory of 40 CFR Part 63, Subpart MMMM.

The provisions of 40 CFR Part 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 Part 63, Subpart MMMM.

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 no later than 27 months following the effective date of 40 CFR Part 60, Subpart MMMM, 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 Part 63, Subpart MMMM, the Permittee shall submit the:

- (1) Applicable notifications in 40 CFR 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 paragraphs (2) and (3) below.
- (2) Initial Notification required by 40 CFR 63.9(b).
- (3) Notification Of Compliance Status required by 40 CFR 63.9(h). 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).

Note that, pursuant to 40 CFR 63.3881, the surface coating operations in Plant 2 are not subject to 40 CFR Part 63, Subpart Mmmm because they are used in the surface coating of "assembled on-road vehicles" which are subject to 40 CFR Part 63, Subpart Pppp.

- (h) The surface coating operations in Plant 2 and associated activities in Plants 26, 29, and 31 are subject to the requirements of 40 CFR Part 63, Subpart Pppp (National Emission Standards for Hazardous Air Pollutants - Surface Coating of Plastic Parts and Products) because they are located at a source which is a major source of HAPs and are used for the surface coating of plastic parts and products. A copy of the MACT is available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Note that the surface coating operations fall under the "assembled on-road vehicle" coating subcategory of 40 CFR Part 63, Subpart Pppp.

The provisions of 40 CFR Part 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 Part 63, Subpart Pppp.

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 no later than 27 months following the effective date of 40 CFR Part 63, Subpart Pppp, 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 Part 63, Subpart Pppp, the Permittee shall submit the:

- (1) Applicable notifications in 40 CFR 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 paragraphs (2) and (3) of this section.
- (2) Initial Notification required by 40 CFR 63.9(b) and 40 CFR 63.4510(b).
- (3) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510(c). 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).

Note that, pursuant to 40 CFR 63.4481, the surface coating operations in Plant 1 are not subject to 40 CFR Part 63, Subpart Pppp because greater than 90% of the coatings are applied to plastic parts and are subject to 40 CFR Part 63, Subpart Mmmm.

- (i) The reinforced plastic composite production operations (located in Plant 36 and Plant

37) are subject to the requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants - Reinforced Plastic Composites Production) because they are located at a source which is a major source of HAPs and are used for the production of reinforced plastic composites. 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 Part 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 nine months prior to the compliance date for the MACT, April 21, 2006, 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 Part 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification required by 40 CFR 63.9(b)(2) and 40 CFR 63.3910(b).
 - (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status according to 40 CFR 63.9(h) and 40 CFR 63.3910(c).
 - (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 according to 40 CFR 63.9(h) and 40 CFR 63.3910(c).
 - (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.
- (j) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories (Industrial, Commercial, & Institutional Boilers and Process Heaters) affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
- (1) This rule requires the source to:

- (A) Submit a Part 1 MACT Application by May 15, 2002; and
 - (B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR Part 63, Subpart B, for the affected source category.
- (2) The Permittee submitted a Part 1 MACT Application on May 14, 2002.
- (3) 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 MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
- (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
 - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
 - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (k) Facility D1-01 is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

Facility D1-01, located in Plant 1, has a pre-control PM PTE greater than 100 tons per year, is subject to the requirements of 326 IAC 6-3-2, and uses a baghouse for PM control. Therefore, facility D1-01 is subject to the requirements of 40 CFR Part 64. However, the Part 70 permit application was submitted prior to April 20, 1998; therefore, pursuant to 40 CFR 64.5, facility D1-01 is not subject to the rule until such time that the Part 70 permit must be renewed.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on April 29, 1999.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was originally constructed in 1961. From 1977 to 1996, the source was issued several permits for the construction and operation of numerous facilities. While the number and type of approvals is known, there is very little information available about the contents of those approvals. As a result, the following PSD summary begins with the issuance of CP 039-7335-00017, issued July 24, 1997, which superseded all prior permits (Note that the source does not belong to 1 of the 28 PSD source categories with a major source threshold of 100 tons per year):

On July 24, 1997, Monaco was issued CP 039-7335-00017 for a modification to Plant 30 (now identified as Plant 1). This approval was designed to supersede all prior permits and therefore addressed all of the existing units at that time. CP 039-7335-00017 contained the following various VOC input limits in order to classify the source as a PSD minor source.

Pursuant to CP 039-7335-00017, issued July 24, 1997:

- (a) The total VOC input to the dip tank, two (2) spray booths, adhesive application and assembly operations located at Plant 30 (now identified as Plant 1) shall be limited to 57.5 tons per twelve (12) consecutive month period.
- (b) The total VOC input to the three (3) paint booths and the west side-out assembly/final inspection area located at Plant 31 shall be limited to 34.5 tons per twelve (12) consecutive month period.
- (c) The total VOC input to the five (5) fiberglass chop booths and five (5) grinding booths located at Plant 36 shall be limited to 103.2 tons per twelve (12) consecutive month period.
- (d) The total VOC input to the facilities located at Plants 26 and 37 shall be limited to 23.0 tons per twelve (12) consecutive month period.
- (e) The total VOC input to the rest of the source (Plants 20, 22, 28, 29, 38 and 45) shall be limited to 10.3 tons per twelve (12) consecutive month period.

Compliance with these limits is equivalent to VOC emissions of 228.5 tons per year per twelve (12) consecutive month period.

On January 9, 1998, Monaco was issued CP 039-8662-00017 for the addition of a motor home painting process designated as Plant 2. Since the application for CP 039-8662-00017 was received within twelve months from receipt of the application to modify Plant 1 (CP 039-7335-00017), the VOC emissions from Plant 2 were limited to 193.2 tons per twelve consecutive month period to ensure that the aggregate VOC emissions from both modifications was less than 250 tons per year and the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) did not apply. Following the issuance of CP 039-8662-00017, the source became a PSD major source. The 193.2 ton per year Plant 2 limit was calculated as follows:

[249 tpy (VOC PTE of a PSD major modification) - 38.2 tpy (VOC PTE of Plant 1 modification permitted via CP 039-7335-00017)] x 11/12 (factor to ensure compliance) = 193.2 tpy

On June 30, 1999, Monaco was issued 039-10912-00017 to modify CP 039-8662-00017. This modification increased the Plant 2 VOC limit from 193.2 tons per year to the legally afforded 210.8 tons per year by eliminating the 11/12 factor originally used to determine the limit.

On May 15, 2001, the source was issued SSM 039-12758-00017 to: 1) add a barrier coat spray station, identified as BC36-1, to Plant 36; and 2) replace the various plant-specific VOC input limits from CP 039-7335-00017 (which were equivalent to VOC emissions of less than 228.5 tons per year) with 249 ton per year limit to allow for maximum operational flexibility and facilitate compliance determination. The aggregate 228.5 ton per year VOC figure was previously obtained by multiplying the 250 ton per year PSD threshold by a factor of 11/12 to ensure compliance. Therefore, the plant-specific VOC limits, equivalent to 228.5 tons of VOC per year, were replaced with the legally afforded multiple-plant 249 tons of VOC per year input limit. See the Existing Approvals section of further information.

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and as revised by this Part 70 permit, the combined input of volatile organic compounds (VOC) to Plants 1, 20, 22, 26, 28, 29, 31, 32, 36, 37, and 38 shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit is equivalent to VOC emissions of less than 250 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Note that SSM 039-12758-00017 was the first modification issued subsequent to the source becoming a PSD major source. While this permit stated that facility BC36-1 was included in the multiple-plant 249 ton per year VOC limit, it did not include a condition that rendered the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) not applicable to BC36-1. As a result, the following condition is incorporated into this Part 70 permit:

The total volatile organic compound (VOC) input to facility BC36-1 shall not exceed 40 tons per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to VOC emissions of less than 40 tons per year and will render the requirements of 326 IAC 2-2 (PSD) not applicable.

On May 9, 2002, Monaco submitted an application for a PSD Significant Source Modification to add thirteen new booths to modify one (1) partial paint line (identified as Line A), modify two (2) existing full paint lines (identified as Lines D and E), and create two new (2) full paint lines (identified as Lines B and C) at Plant 2. Each of the existing paint lines were to be modified with the addition of several new booths and the rearrangement of several existing booths. The VOC potential to emit from the modification was greater than the 40 ton per year PSD significance threshold for VOC. As a result, the modification was subject to the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration).

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, 40 CFR 52.21, 326 IAC 2-2, 326 IAC 2-4.1, and as revised by this Part 70 permit:

All facilities located at Plant 2 (Partial Paint Line A, Full Paint Lines B through E, prep area, repair area, undercoating operation, and final inspection area) must comply with the following requirements:

- (a) Lacquer thinners and preparation cleaners and solvents used on motor home exteriors will be hand-wiped and contain a maximum 6.5 pounds VOC per gallon of coating as applied.

- (b) Except as provided below, primers will be applied using high volume-low pressure (HVLP) spray equipment, or the equivalent, and contain a maximum of 3.5 pounds VOC per gallon of coating as applied.
- (c) Except as provided below, base coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 6.5 pounds VOC per gallon of coating as applied.
- (d) Except as provided below, clear coats will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.
- (e) Except as provided below, sealers will be applied using HVLP spray equipment, or the equivalent, and contain a maximum VOC content of 3.5 pounds VOC per gallon of coating as applied.
- (f) As an alternative to complying with the individual VOC content limitations for base coats and clear coats, compliance may be determined by averaging the emissions from base coat and clear coat operations across affected lines. The average VOC content for the base coat/clear coat system shall be limited to less than or equal to 4.5 pounds VOC per gallon of coating as applied. This limitation is based on a ratio of two parts clear coat to one part base coat. Compliance will be demonstrated monthly based on the actual VOC content as applied of each coating and actual usage of base coats and clear coats during the month.
- (g) Good housekeeping practices will be employed to minimize leaks, spills, and evaporative losses. These include: sealing lids on all containers not in use or in storage, the purging of guns and lines into approved containers, maintaining an organized spill response and clean-up operation, performing routine maintenance on spray equipment and pumps to prevent drips and seal leaks, the use of solvent recovery systems to recover reusable solvents for on-site or off-site recycling, and using aqueous, exempt solvents or citric cleaners where effective and practical.
- (h) All coating materials, including primers, base coats, and clear coats, used in the repair booths will be applied with air-atomized spray equipment, or the equivalent.
- (i) When necessary, motor home exteriors will be hand-wiped with cleaning solvent prior to painting.
- (j) Collected solvents will be recycled on-site and off-site to recover reusable solvents and minimize waste.
- (k) Motor homes will be undercoated with a waterborne-low VOC coating.
- (l) The surface coating operations in Partial Paint Line A and Full Paint Lines B through E shall use, in aggregate, less than 539 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, VOC emissions from insignificant natural gas fired air-make-up units, the use of low VOC/high solids coatings listed in (a) through

(k) above, and required high transfer application methods, is equivalent to VOC emissions (from Partial Paint Line A and Full Paint Lines B through E) of less than or equal to 540.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these requirements and limits will satisfy the requirements of 326 IAC 2-4.1, 40 CFR 52.21, and 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County which is classified as an attainment area for all pollutants. Therefore, the requirements of 326 IAC 2-3 do not apply.

326 IAC 2-4.1 (Hazardous Air Pollutants)

None of the facilities located in Plants 1, 20, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 37, 38 and 46 were constructed or reconstructed after July 27, 1997 and have the potential to emit greater than or equal to 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to any of the facilities located at Plants 1, 20, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 37, 38 and 46.

The barrier coat spray station, identified as BC-1, located at Plant 36, was constructed after July 27, 1997 and has the potential to emit greater than 10 tons per year of a single HAP and greater than 25 tons per year of any combination of HAPs. However, pursuant to SSM 039-12758-00017, issued May 15, 2001, the addition of BC-1 is not considered a new or reconstructed process or production unit, therefore, facility BC-1 is not subject to the requirements of 326 IAC 2-4.1.

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, Partial Paint Line A, and Full Paint Lines B through E are subject to the requirements of 326 IAC 2-4.1. See State Rule Applicability - 326 IAC 2-2 for the specific requirements.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year VOC pollutant and is located in Elkhart County. 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 requirement 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 Exemptions), 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 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust)

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 6-5 (Fugitive Particulate Matter Emission Limitations)

The source has not added a facility after December 13, 1985 which generates fugitive particulate emissions greater than 25 tons per year. Paved roads are the only source of fugitive particulate matter at this source and generate less than 1.0 ton per year fugitive particulate matter from vehicular traffic. As a result, the requirements of 326 IAC 6-5 are not applicable to this source.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source, and the facilities contained therein, are not subject to the requirements of 326 IAC 8-6 because it is located in Elkhart County and commenced operation prior to October 7, 1974.

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

This source has the potential to emit greater than 10 tons per year of a single HAP and the potential to emit greater than 25 tons per year of any combination of HAPs, manufactures reinforced plastic composite parts and products, uses resins and gel coats which contain styrene in an open molding process, and has actual styrene emissions greater than 3 tons per year.

However, pursuant to 326 IAC 20-25-1(b) and 326 IAC 20-25-3(e), facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 are not subject to the requirements of 326 IAC 20-25 because they obtained a revised BACT determination after June 28, 1998 and before January 1, 2002 (SSM 039-12758-00017, issued May 15, 2001).

Pursuant to 326 IAC 20-25-3(e), facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 will become subject to the requirements of 326 IAC 20-25 if they are modified which results in an increase in potential to emit of styrene.

State Rule Applicability - Plant 1 (formerly Plant 30): Assembly plant

Note: Plant 30 was renovated in 1996 and re-designated as Plant 1.

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from surface coating booths SV1-3 and SV1-4 shall be limited by the following:

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:

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

Under the rule revision, particulate from booths SV1-3 and SV1-4 shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The insignificant metal working operation (D1-02) is not subject to 326 IAC 6-3-2 because it is not a source of particulate emissions; it exhausts indoors.

Pursuant to CP 039-7335-00017, issued July 24, 1997, and 326 IAC 6-3-2, the allowable particulate emission rate from:

- (a) Woodworking millroom D1-01 shall not exceed 4.10 pounds per hour based on a maximum process weight rate of 1.0 ton per hour. The baghouse for particulate control shall be in operation at all times when D1-01 is in operation.
- (b) Each of the Plant 1 manual assembly lines shall not exceed 2.03 pounds per hour based on a maximum process weight rate of 0.35 tons per hour each.
- (c) The welding operations shall not exceed, in aggregate, the allowable particulate emission rate of 1.02 pounds per hour based on a maximum process weight rate of 252 pounds per hour.

These pound per hour limitations were calculated with the following equation:

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

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

The dip tank coating operation and sidewall adhesive application process are not subject to the requirements of 326 IAC 6-3-2 because they are not a source of particulate emissions.

326 IAC 8-1-6 (Volatile Organic Compounds: BACT)

The requirements of 326 IAC 8-1-6 do not apply to the metal working area, millroom woodworking operations, and welding operations because they are not sources of VOC.

The requirements of 326 IAC 8-1-6 do not apply to dip tank coating operation SV1-5, sidewall adhesive application process SV1-6, and surface coating booths SV1-3 and SV1-4 because they are subject to the requirements of 326 IAC 8-2-9.

The three manual assembly lines are not subject to the requirements of 326 IAC 8-1-6 because each has a VOC PTE significantly less than 25 tons per year.

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

Booth SV1-3, booth SV1-4, and dip coating operation SV1-5 are subject to the requirements of 326 IAC 8-2-9 because each unit coats metal parts, has the potential to emit VOC greater than 25 tons per year, and was constructed after November 1, 1980.

Pursuant to 326 IAC 8-2-9(b)(7) and (c), sidewall adhesive application process SV1-6 is subject to the requirements of 326 IAC 8-2-9 because it applies adhesives and commenced operation after July 1, 1991.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by the dip tank coating operation and surface coating booths SV1-3 and SV1-4 shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes 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 such a manner that evaporation is minimized.

State Rule Applicability - Plant 2: Final Paint Plant

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, CP 039-8662-00017, issued January 9, 1998, and 40 CFR 52 Subpart P, the particulate matter (PM) from the surface coating operations in the Partial Paint Line A, Full Paint Lines B through E, repair area, and undercoating operation, shall be limited by the following:

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:

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

Under the rule revision, particulate from the surface coating operations shall be controlled by a dry filter and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

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

The paint prep and hand-applied final inspection areas are not subject to the requirements of 326 IAC 6-3-2 because they are not sources of particulate emissions.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The surface coating operations in Plant 2 are not subject to the requirements of 326 IAC 8-1-6 because they would be regulated by the provisions of 326 IAC 8-2-9 if the capacity was equal to or greater than thirty-five (35) vehicles per day.

326 IAC 8-2-9 (Volatile Organic Compounds)

Each paint line (partial paint line A and full paint lines B through E) has a maximum capacity less than thirty-five (35) vehicles (motor homes) per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to the paint lines.

Pursuant to PSD SSM 039-15620-00017, issued December 11, 2002, any change or modification which may increase the maximum capacity of any paint line to greater than 35 vehicles per day must be approved by the OAQ before any such change may occur.

State Rule Applicability - Plant 20: Welding and adhesive application

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in

a subsequent permit action.

326 IAC 6-3-2 (Particulate)

Pursuant to CP 039-7335-00017, issued July 24, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the sidewall welding operation (EU-20B) shall not exceed 0.12 pounds per hour when operating at a maximum process weight rate of 3.0 pounds 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:

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

Pursuant to 326 IAC 6-3-1(b)(14) of the revised rule, the sidewall welding operation (EU-20B) is not subject to the requirements of 326 IAC 6-3-2 because the particulate potential to emit from EU-20B is less than 0.551 pounds per hour.

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

The adhesive application process (EU-20A) is not subject to the requirements of 326 IAC 6-3-2 because it is not a source of particulate emissions.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The adhesive application process (EU-20A) is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to January 1, 1980.

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

Pursuant to 326 IAC 8-2-9(b)(7) and (c), the adhesive application process (EU-20A) is not subject to the requirements of 326 IAC 8-2-9 because it applies adhesives that commenced operation prior to July 1, 1991.

State Rule Applicability - Plant 22: Metal Shop

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain as the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the dash production area (GV22-3/GV22-4) shall be limited by the following:

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:

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

Under the rule revision, particulate from the dash production area shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with

manufacturer's specifications.

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

Pursuant to CP 039-7335-00017, issued July 24, 1997 and 326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes), the allowable particulate emission rate from the insignificant metal cutting operation (EU-22) shall not exceed 2.29 pounds per hour when operating at a maximum process weight rate of 0.42 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:

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

The cyclone shall be in operation at all times when the metal cutting operation is in operation in order to comply with this limit.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The dash component production area (GV22-3/GV22-4) is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to January 1, 1980 and is subject to 326 IAC 8-2-9.

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

The dash component production area (GV22-3/GV22-4) is subject to the requirements of 326 IAC 8-2-9 because it coats metal and non-metal parts, was constructed before November 1, 1980, and is located in Elkhart county at a source with a VOC PTE equal to or greater than 100 tpy.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components by the dash component production area (GV22-3/GV22-4) shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings when coating metal parts.

Solvent sprayed from application equipment during cleanup or color changes 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 such a manner that evaporation is minimized.

State Rule Applicability - Plant 28: Formtec (Thermofforming)

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

EU-28 and SV28-01 are not sources of particulate and are therefore not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

EU-28 and SV28-01 were each constructed after January 1, 1980. However, each has the potential to emit VOC less than 25 tons per year. Therefore, EU-28 and SV28-01 are not subject to the requirements of 326 IAC 8-1-6.

- (a) Any change or modification which may increase the VOC potential to emit of the plastic dash component vinyl wrapping operation (EU-28) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.
- (b) Any change or modification which may increase the VOC potential to emit of the tank

cover chemical welding operation (SV28-01) to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.

State Rule Applicability - Plant 36: Fiberglass fabrication; and Plant 37: Fiberglass molding

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain as the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 039-7335-00017, issued on July 24, 1997, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be limited by the following:

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:

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

Under the rule revision, particulate from facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to CP 039-7335-00017, issued July 24, 1997 and 326 IAC 6-3-2, the allowable particulate emission rate from the grinding stations (GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5) shall not exceed 2.29 pounds per hour each when operating at a maximum process weight rate of 0.42 tons per hour each.

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:

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

The dry filters shall be in operation at all times when the grinding stations are in operation in order to comply with this limit.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

Facilities GB36-1, GB36-2, GB36-3, GB36-4, and GB36-5 are not subject to the requirements of 326 IAC 8-1-6 because they are not sources of VOC emissions.

Facilities GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 were each constructed after January 1, 1980 and have the VOC potential to emit greater than 25 tons per year. Therefore each facility is subject to the requirements of 326 IAC 8-1-6.

Pursuant to CP 039-7335-00017, issued July 24, 1997, SSM 039-12758-00017, issued May 15, 2001, and 326 IAC 8-1-6, BACT for GC36-1, GC36-2, BC36-1, SV36-1&2, SV36-3&4, SV36-5&6, GB36-1, GC36-3, CS36-4, CS36-5, CS37-1, and GC37-1 has been determined to be the following:

- (a) 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 249 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
- (1) 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. The emission factors used shall be 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, April 1999, 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.
- (b) 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, -- Non corrosion Resistant Filled (\geq 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, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table 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

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, fluid impingement technology (FIT), resin impregnators, flow choppers, pressure-fed rollers, 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 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. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device. Use of a certified controlled spray program or other emission reduction techniques not yet identified must be approved by IDEM, OAQ prior to use.

- (d) 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.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP material shall be used for cleanup solvent.
- (2) For VOC- and/or HAP-containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the 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.
- (3) All VOC- and/or HAP-containing material storage containers shall be kept covered when not in use.

State Rule Applicability - Specifically Regulated Insignificant Activities - Plant 31 and Plant 32

326 IAC 6-2-3 (Particulate Matter- Sources of Indirect Heating)

The 12.0 MMBtu/hr boiler located in Plant 31 is subject to the requirements of 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) because the source is located in Elkhart County and the boiler was constructed in prior to September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from the boiler shall not exceed 2.03 pounds per MMBtu heat input. This limitation is calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

$$C = 50 \text{ u/m}^3$$

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source max. operating indirect heating capacity (Q = 12 MMBtu/hr)

N = number of stacks (N = 1)

a = plume rise factor (a = 0.67)

h = stack height (h = 30 ft)

The date the boiler began operation is uncertain. It is assumed it began operation after June 8, 1972. Therefore, pursuant to 326 IAC 6-2-3(e), the particulate emissions from this boiler shall in no case exceed 0.616/MMBtu heat input.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant CNC router shall be limited by 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:

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

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 requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain as the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the insignificant R&D fiberglass spray booth (SV32-1) shall be limited by the following:

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:

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

Under the rule revision, particulate from the insignificant fiberglass spray booth shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The insignificant R&D fiberglass spray booth (SV32-1) was constructed in 1984 and is not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year.

Any change or modification which may increase the potential VOC emissions from SV32-1 to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

State Rule Applicability - Specifically Regulated Insignificant Activities - Plant 38

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant MIG welders, plasma torch, oxyacetylene torches, metal grinders, metal drill presses, metal lathe, metal mills, wood table saw, and wood sander shall be limited by 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:

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

326 IAC 8-2-5 (Paper Coating Operations)

The requirements of 326 IAC 8-2-5 do not apply to the insignificant soy-based ink printing presses because these operations are not web coating or saturation processes of paper, metal foil, plastic and pressure sensitive tape and labels.

326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Industry)

The requirements of 326 IAC 8-5-5 do not apply to the three soy-based ink printing presses

(constructed after November 1, 1980) because the potential VOC emissions from each facility is less than 25 tons per year.

Any change or modification which may increase the potential VOC emissions from each of the insignificant printing presses to greater than 25 tons per year must be approved by the OAQ before any such change may occur.

Testing Requirements

PM/PM10 and VOC are the major pollutants emitted from this source.

PM/PM10 testing is not required for any facilities located at this source because: 1) the PM emissions from any one facility do not account for a significant portion of the source's potential to emit PM/PM10; 2) compliance with 326 IAC 6-3-2 is expected with the use of the dry filters and baghouses; and 3) compliance monitoring of the control devices will ensure compliance with the limitations.

VOC testing is not required for any facilities located at this source because no facilities utilize a control device and VOC emissions are assumed to be 100% of VOC input. Therefore, compliance is determined through records of VOC use.

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.

- (a) The operations in Plant 1 shall comply with the following compliance monitoring requirements:
 - (1) The Permittee shall implement an operator training program.
 - (A) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained upon hiring or transfer.
 - (B) 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.
 - (C) All operators shall be given refresher training annually.
 - (D) Additional inspections and preventive measures shall be performed as

prescribed in the Preventive Maintenance Plan.

- (2) An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from D1-01. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (3) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

These monitoring conditions are necessary because proper operation of the dry filters and baghouses are necessary to ensure compliance with 326 IAC 6-3-2.

Compliance monitoring (visible emission notations and parametric monitoring) is not required for the millroom woodworking (D1-01) because the allowable particulate emission rate from each facility is sufficiently low.

- (b) The operations in Plant 2 shall comply with the following compliance monitoring requirements:
 - (1) The Permittee shall implement an operator training program.
 - (A) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained upon hiring or

transfer.

- (B) 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.
 - (C) All operators shall be given refresher training annually.
 - (D) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (2) Visible emission notations of the stack exhaust from the paint prep areas shall be performed once per shift when sanding is performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because proper operation of the dry filters is necessary to ensure compliance with 326 IAC 6-3-2.

- (c) There are no compliance monitoring requirements for the facilities in Plant 20. Compliance monitoring is not required for the sidewall welding operations (EU-20B) because the allowable emissions are sufficiently low. The adhesive application process (EU-20A) will demonstrate compliance with the VOC usage limit pursuant to 326 IAC 2-2 by maintaining records of the amount and type of coating used.
- (d) The operations in Plant 22 shall comply with the following compliance monitoring requirements:
 - (1) The Permittee shall implement an operator training program.
 - (A) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained upon hiring or transfer.
 - (B) 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.

- (C) All operators shall be given refresher training annually.
 - (D) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (2) 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because proper operation of the cyclone and dry filters is necessary to ensure compliance with 326 IAC 6-3-2.

Compliance monitoring (visible emission notations, parametric monitoring and inspections) is not required for the baggage door assembly area and metal cutting operation (EU-22) because the allowable particulate emission rate from the facility is sufficiently low.

- (e) There are no compliance monitoring requirements for the facilities in Plant 26. Compliance monitoring is not required for the inspection bays because compliance with the VOC usage limit will be demonstrated by maintaining records of the amount and type of coating used.
- (f) There are no compliance monitoring requirements for the facilities in Plant 28. Compliance monitoring is not required for the facilities because compliance with the VOC usage limit will be demonstrated by maintaining records of the amount and type of coating used.
- (g) There are no compliance monitoring requirements for the facilities in Plant 29. Compliance monitoring is not required for the facilities because compliance with the VOC usage limit will be demonstrated by maintaining records of the amount and type of coating used.
- (h) The operations in Plants 31 and 32 shall comply with the following compliance monitoring requirements:
 - (1) The Permittee shall implement an operator training program.
 - (A) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained upon hiring or

transfer.

- (B) 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.
- (C) All operators shall be given refresher training annually.
- (D) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because proper operation of the dry filters is necessary to ensure compliance with 326 IAC 6-3-2.

- (i) The operations in Plants 36 and 37 shall comply with the following compliance monitoring requirements:
 - (1) The Permittee shall implement an operator training program.
 - (A) 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 permit issuance if training was not completed in the last twelve months. All new operators shall be trained upon hiring or transfer.
 - (B) 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.
 - (C) All operators shall be given refresher training annually.
 - (D) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because proper operation of the dry filters is necessary to ensure compliance with 326 IAC 6-3-2.

- (j) There are no compliance monitoring requirements for the facilities in Plant 38 because emissions from the respective facilities is sufficiently low.

Conclusion

The operation of this stationary source that assembles and paints high-quality, luxury motor homes shall be subject to the conditions of the attached proposed Part 70 Permit No.T039-7559-00017.