CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Newmar Corporation / Service and Repair Center
72185 CR. 3
Nappanee, Indiana 46550

is hereby authorized to construct

A recreational vehicle service and repair center limited to a throughput of 34 vehicles per day, consisting of the following equipment:

a) Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as BR-1 and BR-2.

b) Woodworking and machining equipment, consisting of saws, grinders, drills, and sanders, with no particulate controls or collection, and one (1) table saw, with a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity.

c) Two (2) stick welding stations, two (2) metal inert gas (MIG) welding stations, two (2) acetylene cutting torches, and one (1) electric plasma cutter.

d) Miscellaneous volatile organic compound (VOC) containing adhesives, coatings, sealants, and cleaning solvents associated with recreational vehicle service and repair.

e) Fifteen (15) tube heaters and five (5) unit heaters, each with a maximum rated capacity of less than ten (10) million British thermal units (MMBtu) per hour.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-039-8804-00157	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

2. That this permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

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

5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

   (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

   (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

   (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

   (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).

   (e) The Permittee has submitted their Part 70 application (T039-7571-00157) on December 13, 1996, for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

2. That the Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

   (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

   (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

   (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

   The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):

   (a) In the event that ownership of this recreational vehicle service and repair center is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

   (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

   (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

   (a) Violation of any conditions of this permit.
   (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

Malfunction Condition

7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

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

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

Opacity Limitations

9. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

10. That pursuant to 326 IAC 6-3 (Process Operations),

(a) The portable dust collector shall be in operation at all times when the table saw is in operation.

(b) The woodworking and machining operations shall not exceed the allowable particulate matter (PM) emission rate of 0.48 pounds per hour.

The pounds per hour limitation was calculated using the following 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

(c) Inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

11. That pursuant to 326 IAC 6-3 (Process Operations):

(a) The dry filters for particulate matter overspray control shall be in operation at all times when either of the spray booths are in operation.

(b) The spray booths BR-1 and BR-2 shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour.

(c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.

(d) Weekly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.

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

Fugitive Dust Emissions

12. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

Fugitive Dust Emissions

13. That pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on July 18, 1997. This plan consists of adding gravel as needed to the unpaved stone and gravel roadways.

BACT Minor Limitation

14. The VOC input to the fiberglass coating operations proposed in this modification shall be limited to two (2) tons per calendar month (twenty-four (24) tons of VOC per year). Therefore, the Best Available control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply. Any change or modification which may alter the fiberglass coating operations such that allowable VOC emissions will increase to 25 tons per year or greater, shall obtain a permit modification pursuant to 326 IAC 8-1-6 before such change may occur.

Volatile Organic Compound (VOC) Limitations

15. That the customized top coating applied for the purpose of recreational vehicle repair shall not exceed thirty-four (34) vehicles per day, and therefore the requirements of 326 IAC 8-2-9 do not apply. Any change or modification which may increase production to thirty-five (35) vehicles per day or greater from the equipment covered in this permit, or which may alter operations such that there are metal coating operations not associated with repair activities, shall obtain a permit modification pursuant to 326 IAC 8-2-9 before such change may occur.

Reporting Requirements

16. That a log of information necessary to document compliance with operation permit condition nos. 14 and 15 shall be maintained. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAM).

(a) A quarterly summary shall be submitted to:

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

within thirty (30) calendar days after the end of the quarter being reported in the format attached. This summary report shall include the monthly VOC emitted and a daily record of the number of recreational vehicles processed.

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(I) Postmarked on or before the date it is due; or

(ii) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d) Any corrective actions taken as a result of an exeedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

Open Burning

17. That 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.

18. Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

within 180 days from the date on which this source commences operation.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.

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

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

(f) Upon direct notification by IDEM, OAM, 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]

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section

Quarterly Report

Source Name: Newmar Corporation / Service and Repair Center
Source Address: 72185 CR. 3, Nappanee, Indiana 46550
Permit No.: CP-039-8804-00157
Facility: Recreational vehicle service and repair center
Parameter: Total VOC emissions (Tons of VOC per year)
Limit: 2 tons of VOC per calendar month (24 tons of VOC per year)

YEAR: _____

Month	Usage/Emissions (tons/month)

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: _____

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section

Quarterly Report

Source Name: Newmar Corporation / Service and Repair Center
Source Address: 72185 CR. 3, Nappanee, Indiana 46550
Permit No.: CP-039-8804-00157
Facility: Recreational vehicle service and repair center
Parameter: Vehicle throughput
Limit: 34 vehicles per day

Quarter: _____ Year: _____

Day	Processing this day (vehicles/day)	Day	Processing this day (vehicles/day)	Day	Processing this day (vehicles/day)
1		11		21	
2		12		22	
3		13		23	
4		14		24	
5		15		25	
6		16		26	
7		17		27	
8		18		28	
9		19		29	
10		20		30	
				31	

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: _____

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?_____, 100 LBS/HR VOC ?_____, 100 LBS/HR SULFUR DIOXIDE ?_____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?_____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____

LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____
MEASURES TAKEN TO MINIMIZE EMISSIONS: _____
_____
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

REV 3/96 FAX NUMBER - 317 233-5967 *SEE REVERSE

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO2, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Newmar Corporation / Service and Repair Center
Source Location:	72185 CR. 3, P.O. Box 30, Nappanee, Indiana 46550
County:	Elkhart
Construction Permit No.:	CP-039-8804-00157
SIC Code:	3716
Permit Reviewer:	Eric Henricks/KERAMIDA Environmental, Inc.

The Office of Air Management (OAM) has reviewed an application from Newmar Corporation relating to the construction and operation of a recreational vehicle service and repair center, consisting of the following equipment:

a) Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as BR-1 and BR-2.
b) Woodworking and machining equipment, consisting of saws, grinders, drills, and sanders, with no particulate controls or collection, and one (1) table saw, with a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity.
c) Two (2) stick welding stations, two (2) metal inert gas (MIG) welding stations, two (2) acetylene cutting torches, and one (1) electric plasma cutter.
d) Miscellaneous volatile organic compound (VOC) containing adhesives, coatings, sealants, and cleaning solvents associated with recreational vehicle service and repair.
e) Fifteen (15) tube heaters and five (5) unit heaters, each with a maximum rated capacity of less than ten (10) million British thermal units (MMBtu) per hour.

Source Definition

This motor home and travel trailer manufacturing company consists of two (2) plants:

(a) The manufacturing center is located at 355 North Delaware Street, Nappanee, Indiana; and
(b) The Service and repair center is located at 72185 CR. 3, Nappanee, Indiana.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one company, they will be considered as one (1) source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
BR-1	Spray booth BR-1	27.0	2.5	8395	77

BR-2	Spray booth BR-2	27.0	2.5	8394	77

Recommendation

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

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

An application for the purposes of this review was received on July 18, 1997, with additional information received on September 16, 1997.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (5 pages).

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	7.87	9.04
Particulate Matter (PM10)	7.87	9.04
Sulfur Dioxide (SO_2)	0.01	0.01
Volatile Organic Compounds (VOC)	24.0	26.5
Carbon Monoxide (CO)	0.24	0.24
Nitrogen Oxides (NO_x)	1.14	1.14
Single Hazardous Air Pollutant (HAP)	3.58	4.29
Combination of HAPs	8.16	9.79

(a) Allowable emissions are determined from the applicability of rule 326 IAC 8-1-6, 326 IAC 8-2-9(b)(4), and a processing limit of thirty-four (34) vehicles per day, as established by the attached construction permit. See attached spreadsheets for detailed calculations.

(b) Potential emissions (as defined in the Indiana Rule) of VOCs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NOx 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 and NOx

emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for TSP, PM10 and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	30.9
PM10	30.9
SO_2	0.1
VOC	210.6
CO	3.1
NO_x	9.6

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the technical support document included with construction permit CP-039-4795-00157, issued March 25, 1996.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limits, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	7.87	7.87	0.01	22.09	0.24	1.14
Contemporaneous Increases	0.00	0.00	0.00	0.00	0.00	0.00
Contemporaneous Decreases	0.00	0.00	0.00	0.00	0.00	0.00
Net Emissions	7.87	7.87	0.01	22.09	0.24	1.14
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission

increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-039-7571-00157) application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12, 40 CFR 60) and National Emission Standards for Hazardous Air Pollutants (40 CFR 63) applicable to this facility.

40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations

The woodworking operations proposed in this modification are not covered by 40 CFR Part 63, Subpart JJ (national Emission Standards for Wood Furniture Manufacturing Operations), because the facilities are not engaged in the manufacture of wood furniture or wood furniture components, as defined in 40 CFR 63.801.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons per year of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement for the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

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

Pursuant to this rule, the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

(a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

(b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

326 IAC 5-1-2 (Visible Emission Limitations)

Pursuant to this rule, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations)

Pursuant to this rule, the woodworking and machining operations shall not exceed the allowable particulate matter (PM) emission rate of 0.48 pounds per hour.

The pounds per hour limitation was calculated using the following 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 is shown by site specific emission factors developed from data collected at the existing source.

326 IAC 6-3-2(c) (Process Operations)

Pursuant to this rule, spray booths BR-1 and BR-2 shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour.

Compliance is shown by the use of the dry filters for overspray control.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

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

Pursuant to this rule, fugitive particulate matter emissions shall be controlled according to the plan submitted on July 18, 1997. This plan consists of adding gravel as needed to the unpaved stone and gravel roadways.

326 IAC 8-1-6 (BACT for VOC Emissions)

The fiberglass coating operations proposed in this modification are not covered by 326 IAC 8-1-6 because the allowable emissions from this source are limited to less than 25 tons VOC per year. This is in conjunction with a thirty-four (34) vehicle per day limit to meet the requirements of 326 IAC 8-2-9. Any change or modification which may alter fiberglass coating operations such that allowable VOC emissions will increase to 25 tons per year or greater, shall obtain a permit modification pursuant to 326 IAC 8-1-6 before such change may occur.

326 IAC 8-2-9(b)(4) (Miscellaneous Metal Coating Operations, Customized Top Coating)

The Permittee has agreed to limit production to thirty-four (34) vans per day. 326 IAC 8-2-9(b)(4) exempts the customized to coating of automobiles and trucks if production is less than thirty-five (35) vehicles per day, therefore, the requirements of 326 IAC 8-2-9 do not apply. Any change or modification which may increase production to thirty-five (35) vehicles per day or greater from the equipment covered in this permit, or which may alter operations such that there are metal coating operations not associated with repair activities, shall obtain a permit modification pursuant to 326 IAC 8-2-9 before such change may occur.

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

The woodworking operations proposed in this modification are not covered by 326 IAC 8-2-12 because the facilities are not engaged in applying coatings to wood substrates. Any change or modification which may alter operations such that coatings are applied to wood substrates, shall obtain a permit modification pursuant to 326 IAC 8-2-12 before such change may occur.

There are no other 326 IAC 8 rules that apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

(b) The operations proposed in this modification are not covered by 326 IAC 2-1-3.4 because the facilities will emit less than ten (10) tons per year of any single hazardous air pollutant, and less that twenty-five (25) tons per year of combined hazardous air pollutants, and therefore will not be a major source of hazardous air pollutants.

Conclusion

The construction of this recreational vehicle service and repair center will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-8804-00157.**

Appendix A: Limited Potential VOC and Particulate Emissions from Surface Coating Operations
Company Name: Newmar Corporation
Address City IN Zip: 72185 CR. 3, Nappanee, Indiana 46550
CP: 039-8804-00157
Reviewer: Eric R. Henricks
Date: October 9, 1997

Table A3. Coating Operations Limited Potential - 35 Vehicle per Day Limit

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Limited VOC pounds per hour	Limited VOC pounds per day	Limited VOC tons per year	Limited PM tons per year	lb VOC /gal solids	Transfer Efficiency
Styrene Resin (10486 F)	8.90	4.90%	0.00%	4.90%	0.00%	42.28%	0.073	1.75	0.44	0.44	0.06	1.11	0.20	2.17	1.03	45%
Laquer (10401 M)	7.90	65.51%	0.00%	65.51%	0.00%	27.00%	0.090	1.75	5.18	5.18	0.82	16.30	2.98	0.86	19.17	45%
Enamel (10021 M)	9.00	95.00%	0.00%	95.00%	0.00%	35.00%	0.090	1.75	8.55	8.55	1.35	26.93	4.92	0.14	24.43	45%
Broma Aerosol (Broma M/F)	6.33	100.00%	0.00%	100.00%	0.00%	0.00%	0.090	1.75	6.33	6.33	1.00	19.94	3.64	0.00	-	45%
Thinner (10176 M/F)	6.99	100.00%	0.00%	100.00%	0.00%	0.00%	0.030	1.75	6.99	6.99	0.37	7.34	1.34	0.00	-	45%
Acrylic Paint (10232 M/F)	10.11	45.00%	0.00%	45.00%	0.00%	36.50%	0.095	1.75	4.55	4.55	0.76	15.13	2.76	1.86	12.46	45%
130 Catalyst (10400 M/F)	8.70	40.95%	0.00%	40.95%	0.00%	47.00%	0.009	1.75	3.56	3.56	0.06	1.16	0.21	0.17	7.58	45%
White Paint (10458M/F)	6.69	77.04%	0.00%	77.04%	0.00%	12.00%	0.120	1.75	5.15	5.15	1.08	21.65	3.95	0.65	42.95	45%
Body Filler (10078 M/F)	14.90	1.50%	0.00%	1.50%	0.00%	68.00%	0.090	1.75	0.22	0.22	0.04	0.70	0.13	0.00	0.33	100%
Caulk (10027 M/F)	10.66	16.00%	0.00%	16.00%	0.00%	54.50%	0.175	1.75	1.71	1.71	0.52	10.45	1.91	0.00	3.13	100%
										TOTALS	6.04	120.71	22.03	5.85		

Limited ton/yr for fiberglass coating: 14.14

Material	Limited PM pounds per hour	Limited PM pounds per day	Limited PM tons per year	Controlled PM pounds per hour
All coatings combined	1.33	32.03	5.85	0.17

Transfer Efficiency	45.0%
Collection Efficiency	90.0%
Control Efficiency	97.0%

HVLP sprayer and dry filter control.

Table A4. Coating Operations HAP Limited Potential - 35 Vehicle per Day Limit

Material	Weight % HAPs										
	Styrene	Toluene	Xylene	Formaldehyde	Ethylbenzene	2-Butoxyethyl acetate	MEK	Methanol	MIBK	Phenol	Ethylene Glycol
	100-42-5	108-88-3	1330-20-7	50-00-0	100-41-4	112-7-2	78-93-3	67-56-1		108-95-2	107-21-1
Styrene Resin (10486)	4.90%										
Laquer (10401)		14.07%	20.82%	0.55%							
Enamel (10021)		10.00%	40.00%		5.00%	5.00%					
Broma Aerosol (Broma)		10.00%	3.00%				3.00%				
Thinner (10176)		60.00%					10.00%	20.00%	10.00%		
Acrylic Paint (10232)		30.00%							5.00%		
130 Catalyst (130)										3.94%	
White Paint (10458)		17.00%	12.00%		2.00%						
Body Filler (10078)	1.50%										
Caulk (10027)											1.00%

Material	Ton per Year HAPs										
	Styrene	Toluene	Xylene	Formaldehyde	Ethylbenzene	2-Butoxyethyl acetate	MEK	Methanol	MIBK	Phenol	Ethylene Glycol
	100-42-5	108-88-3	1330-20-7	50-00-0	100-41-4	112-7-2	78-93-3	67-56-1	108-10-1	108-95-2	107-21-1
Styrene Resin (10486)	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Laquer (10401)	0.00	0.42	0.62	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Enamel (10021)	0.00	0.49	1.97	0.00	0.25	0.25	0.00	0.00	0.00	0.00	0.00
Broma Aerosol (Broma)	0.00	0.36	0.11	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00
Thinner (10176)	0.00	0.80	0.00	0.00	0.00	0.00	0.13	0.27	0.13	0.00	0.00
Acrylic Paint (10232)	0.00	0.83	0.00	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00
130 Catalyst (130)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
White Paint (10458)	0.00	0.67	0.47	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00
Body Filler (10078)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Caulk (10027)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
Single HAP Totals	0.01	3.58	3.17	0.02	0.32	0.25	0.24	0.27	0.27	0.01	0.02

Total Combined HAPs ton/yr
8.16

Methodology

Styrene polyester resin based materials (Resin 10486 and Caulk 10027) are nonvapor-suppressed resin and hand layup materials. Worst case for this category is that 10% of styrene monomer is emitted, 90% polymerizes.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Controlled Particulate Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * ((1-Collection efficiency) + (1-Control Efficiency)) * (8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	Newmar Corporation / Service and Repair Center
Source Location:	72185 CR. 3, P.O. Box 30, Nappanee, Indiana 46550
County:	Elkhart
Construction Permit No.:	CP-039-8804-00157
SIC Code:	3716
Permit Reviewer:	Eric Henricks/KERAMIDA Environmental, Inc.

On December 19, 1997, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Newmar Corporation had applied for a construction permit to construct and operate a recreational vehicle service and repair center with dry filter overspray control. The notice also stated that OAM proposed to issue a permit for this installation 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.

Upon further review, the OAM has decided to make the following change to Operation Condition No. 16, Reporting Requirements, of the Construction Permit:

The sentence, “These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use,” was moved to the second sentence of the first paragraph of this condition. This sentence has been moved to avoid possible confusion about information required to be submitted with the quarterly summary.

On January 9, 1998, Newmar Corporation submitted three comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

1. Comment:
The inspection and corrective action requirements indicated at Operation Condition 10 (c) and (d), page 5 of the Construction Permit,

> (c) An inspection shall be performed each calendar quarter on the portable dust collector. If determined to be defective, the dust collector shall be replaced. A record shall be kept of the results of the inspection.
>
> (d) In the event that a dust collector’s failure has been observed, based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

should not be applied to the portable dust collector controlling the table saw. This item qualifies as an insignificant activity under 326 IAC 2-7 and the Preventive Maintenance Plan (PMP) establishes a time line for inspection and corrective action for defective equipment. Newmar Corporation requests that these two requirements be removed.

Response:
The operation of this dust collector would qualify the table saw as an insignificant activity as specified at 326 IAC 2-7-1(20)(E)(xxiii)(FF). The Office of Air Management (OAM) agrees that inspections and corrective action following a PMP will be sufficient. Proposed requirements (c) and (d) of Operation Condition 10 have been removed.

2. Comment:
The inspection requirements specified at Operation Condition 11 (c), page 6 of the Construction Permit,

> (c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or both of the booths are in operation.

are excessive. Newmar Corporation requests that the second sentence of Operation Condition 11 (c) be removed.

Response:
Daily inspections to verify the placement, integrity and particulate loading of the filters will be sufficient. The proposed second sentence of Operation Condition 11 (c) has been removed.

3. Comment:
The draft permit specifies at Operation Condition 18 that an Emergency Reduction Plan (ERP) is required to be submitted. Pursuant 326 IAC 1-5-2 (Episode alert levels: submission of emergency reduction plans), an ERP is required for sources with potential to emit one hundred (100) tons per year or more of any pollutant. Newmar Corporation / Service and Repair Center does not have the potential to emit one hundred (100) tons per year or more of any pollutant and requests that this condition be removed.

Response:
Newmar Corporation has potential emissions greater than 100 tons per year of VOC. The Emergency Reduction Plan condition is therefore applicable and will remain in the permit.