CONSTRUCTION PERMIT and Enhanced New Source Review (ENSR)
OFFICE OF AIR MANAGEMENT

Gulf Stream Coach, Inc.
503 S. Oakland
Nappanee, Indiana 46550

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-039-9271-00145	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a motor home, bus, van, pick-up truck and travel trailer fabrication and assembly operation.

Responsible Official:	Brian Shea
Source Address:	503 S. Oakland, Nappanee, IN. 46550
Mailing Address:	P.O. Box 1005, Nappanee, IN. 46550
SIC Code:	3716
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Major Source, under Title V Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 3, with a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) existing HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 1, with an increase in emissions, a maximum throughput 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) existing HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 2, with an increase in emissions, a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) new HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 4, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 5, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts to the atmosphere.

(g) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161. to a stack designated as H-161.

A.3 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) This existing source has submitted their Part 70 (T-039-7740-00145) application on December 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application. If the facilities listed in this construction permit are not listed in the final Part 70 Operating permit, then the source will be required to submit an administrative amendment request to the Part 70 Operating permit before operation can commence.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

(a) 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).

(b) 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.

B.2 Effective Date of the Permit [IC13-15-5-3]

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

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

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.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.11, 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).

B.5 First Time Operation Permit [326 IAC 2-1-4]

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) The 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).

Operation Conditions

B.6 General Operation Conditions

(a) 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).

(b) 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 (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

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.

B.8 Malfunctions Report [326 IAC 1-6-2]

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. 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.

(b) 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).

(c) 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]

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this motor home, bus, van, pick-up truck and travel trailer fabrication and assembly operation 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.

B.10 Permit Revocation [326 IAC 2-1-9]

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).

B.11 Availability of Permit [326 IAC 2-1-3(l)]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential emissions to the following:

1. 25 tons per year or more (326 IAC 2-1),

2. 100 tons per year or more, and are greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),

3. 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

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

Pursuant to 326 IAC 5 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity shall meet the following:

(a) opacity shall not exceed an average of 40% any one (1) six (6) minute averaging period.

(b) opacity shall not exceed 60% for more than a cumulative total of 15 minutes (60 readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a 6-hour period.

C.3 Operation of Equipment [326 IAC 2-1-3]

All air pollution control equipment listed in this permit shall be in place or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

Testing Requirements

C.4 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 methods approved by IDEM, OAM.

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 Management
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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements

C.5 Compliance Monitoring [326 IAC 2-1-3]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.6 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps

C.7 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]**.**

Record Keeping and Reporting Requirements

C.8 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit a certified, annual emission statement that must be received by April15 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:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

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

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

(c) 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, OAM, on or before the date it is due.

C.9 Monitoring Data Availability [326 IAC 2-1-3]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-1-3]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.11 General Reporting Requirements [326 IAC 2-1-3]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(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 Management
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, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
(2) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
(3) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) 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.

SECTION D.1 FACILITY CONDITIONS

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 3, with a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 1, with an increase in emissions, a maximum throughput 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 2, with an increase in emissions, a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) new HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 4, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 5, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts to the atmosphere.

(g) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161. to a stack designated as H-161.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds (New Facilities; general reduction requirements) [326 IAC 8-1-6]

(a) Paint booths designated as Booths 1, 2 and 3 each have potential volatile organic compounds (VOC) emissions greater than 25 tons per year. Therefore, these facilities are subject to Best Available Control Technology (BACT) requirements pursuant to this rule.

(b) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the above mentioned facilities shall be the following:

1. Use of the following work practices to minimize leaks, spills and evaporative losses:

(a) Water-based, non-VOC/HAP, cleaners shall be utilized for pre-paint cleaning and elsewhere when considered effective and practical.

(b) The cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(c) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(d) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(e) All solvent sprayed during cleanup or color 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.

(f) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

2. The source shall be required to continue testing of non-VOC/HAP clean-up solvents to replace the use of the laquer thinner.

3. Collected solvents will be recycled on-site to recover reusable solvents and minimize waste.

4. The method of application for the three (3) paint booths shall be done with high volume-low pressure (HVLP) spray technique.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

5. The paint booths shall comply with the following individual limits:

(a) Shall not exceed 5.64 pounds of VOC per gallon coating less water for the primer/sealer;
(b) Shall not exceed 6.29 pounds of VOC per gallon coating less water for the base coat; and
(c) Shall not exceed 4.45 pounds of VOC per gallon coating less water for the top coat.

6. That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booths 1-5 shall be limited to 129 tons per year, rolled on a monthly basis.

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 10.75 tons per month.

D.1.2 326 IAC 2-1-3.4 (New Source Toxics Rule):

(a) That the input of HAPs including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booth 3 shall be limited to less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs, rolled on a monthly basis.

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall be less than 0.83 tons per month for a single HAP and less than 2.08 tons per month for a combination of HAPs.

Since the HAP emissions are limited to less than 10 tons per year for a single HAP and 25 tons per year for a combination of HAPs, 326 IAC 2-1-3.4 does not apply to Booth 3.

(b) Any change or modification which may increase the HAP emissions above 10 tons per year for a single HAP and/or 25 tons per year for a combination of HAPs shall require prior approval.

D.1.3 PM Process Operations [326 IAC 6-3]:

Pursuant to 326 IAC 6-3 (Process Operations), the paint booths shall have PM allowable emissions using the following equation:

$E = 4.10\ P^{0.67}$; Where: E = PM allowable emissions in pounds hour
P = Process weight rate in tons per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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.1.5 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC and HAP limits specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D 1.6 Volatile Organic Compound (VOC) Compliance Determination

Compliance with the VOC and content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, 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

D.1.7 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the paint booths are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booths are in operation.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

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

(d) 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.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Condition D.1.1 and D.1.2.

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

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 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.

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: Gulf Stream Coach, Inc. PHONE NO. (219)-773-7761

LOCATION: (CITY AND COUNTY) Nappanee/Elkhart
PERMIT NO. 039-9271 AFS PLANT ID: 039-00145 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:_____

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
Compliance Data Section

Quarterly Report

Company Name: Gulf Stream Coach, Inc.
Location: 503 S. Oakland, Nappanee, Indiana 46550
Permit No.: 039-9271-00145
Source: Booths 1-5
Pollutant: VOC PTE
Limit: 129.0 tons per twelve month period

Year: _____

Month	VOC Usage/Emissions (tons/month)	VOC Usage/Emissions for previous month(s) (tons)	VOC Usage/Emissions for twelve month period (tons)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

Quarterly Report

Company Name: Gulf Stream Coach, Inc.
Location: 503 S. Oakland, Nappanee, Indiana 46550
Permit No.: 039-9271-00145
Source: Booth 1
Pollutant: VOC PTE
Limit: Less than 10 tons/yr for a single HAP;
Less than 25 tons/yr for a combination HAPs

Year: _____

Month	Worst Case Single HAP Usage/ Emissions (tons/ month)	Worst Case Single HAP Usage/ Emissions for previous month(s) (tons)	Combination HAPs Usage/ Emissions (tons/ month)	Combination HAPs Usage/ Emissions for previous month(s) (tons)	Worst Case Single HAP Usage/ Emissions for twelve month period (tons)	Combination HAPs Usage/ Emissions for twelve month period (tons)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

CONSTRUCTION PERMIT and Enhanced New Source Review (ENSR)
OFFICE OF AIR MANAGEMENT

Gulf Stream Coach, Inc.
503 S. Oakland
Nappanee, Indiana 46550

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-039-9271-00145	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a motor home, bus, van, pick-up truck and travel trailer fabrication and assembly operation.

Responsible Official:	Brian Shea
Source Address:	503 S. Oakland, Nappanee, IN. 46550
Mailing Address:	P.O. Box 1005, Nappanee, IN. 46550
SIC Code:	3716
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Major Source, under Title V Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 3, with a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) existing HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 1, with an increase in emissions, a maximum throughput 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) existing HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 2, with an increase in emissions, a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) new HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 4, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 5, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts to the atmosphere.

(g) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161. to a stack designated as H-161.

A.3 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) This existing source has submitted their Part 70 (T-039-7740-00145) application on December 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application. If the facilities listed in this construction permit are not listed in the final Part 70 Operating permit, then the source will be required to submit an administrative amendment request to the Part 70 Operating permit before operation can commence.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

(a) 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).

(b) 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.

B.2 Effective Date of the Permit [IC13-15-5-3]

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

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

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.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.11, 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).

B.5 First Time Operation Permit [326 IAC 2-1-4]

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) The 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).

Operation Conditions

B.6 General Operation Conditions

(a) 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).

(b) 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 (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

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.

B.8 Malfunctions Report [326 IAC 1-6-2]

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. 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.

(b) 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).

(c) 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]

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this motor home, bus, van, pick-up truck and travel trailer fabrication and assembly operation 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.

B.10 Permit Revocation [326 IAC 2-1-9]

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).

B.11 Availability of Permit [326 IAC 2-1-3(l)]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential emissions to the following:

1. 25 tons per year or more (326 IAC 2-1),

2. 100 tons per year or more, and are greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),

3. 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

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

Pursuant to 326 IAC 5 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity shall meet the following:

(a) opacity shall not exceed an average of 40% any one (1) six (6) minute averaging period.

(b) opacity shall not exceed 60% for more than a cumulative total of 15 minutes (60 readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a 6-hour period.

C.3 Operation of Equipment [326 IAC 2-1-3]

All air pollution control equipment listed in this permit shall be in place or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

Testing Requirements

C.4 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 methods approved by IDEM, OAM.

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 Management
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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements

C.5 Compliance Monitoring [326 IAC 2-1-3]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.6 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps

C.7 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]**.**

Record Keeping and Reporting Requirements

C.8 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit a certified, annual emission statement that must be received by April15 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:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

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

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

(c) 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, OAM, on or before the date it is due.

C.9 Monitoring Data Availability [326 IAC 2-1-3]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-1-3]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.11 General Reporting Requirements [326 IAC 2-1-3]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(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 Management
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, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
(2) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
(3) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) 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.

SECTION D.1 FACILITY CONDITIONS

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 3, with a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 1, with an increase in emissions, a maximum throughput 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 2, with an increase in emissions, a maximum throughput of 1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 unit per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) new HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 4, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 5, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts to the atmosphere.

(g) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161. to a stack designated as H-161.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds (New Facilities; general reduction requirements) [326 IAC 8-1-6]

(a) Paint booths designated as Booths 1, 2 and 3 each have potential volatile organic compounds (VOC) emissions greater than 25 tons per year. Therefore, these facilities are subject to Best Available Control Technology (BACT) requirements pursuant to this rule.

(b) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the above mentioned facilities shall be the following:

1. Use of the following work practices to minimize leaks, spills and evaporative losses:

(a) Water-based, non-VOC/HAP, cleaners shall be utilized for pre-paint cleaning and elsewhere when considered effective and practical.

(b) The cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(c) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(d) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(e) All solvent sprayed during cleanup or color 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.

(f) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

2. The source shall be required to continue testing of non-VOC/HAP clean-up solvents to replace the use of the laquer thinner.

3. Collected solvents will be recycled on-site to recover reusable solvents and minimize waste.

4. The method of application for the three (3) paint booths shall be done with high volume-low pressure (HVLP) spray technique.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

5. The paint booths shall comply with the following individual limits:

(a) Shall not exceed 5.64 pounds of VOC per gallon coating less water for the primer/sealer;
(b) Shall not exceed 6.29 pounds of VOC per gallon coating less water for the base coat; and
(c) Shall not exceed 4.45 pounds of VOC per gallon coating less water for the top coat.

6. That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booths 1-5 shall be limited to 129 tons per year, rolled on a monthly basis.

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 10.75 tons per month.

D.1.2 326 IAC 2-1-3.4 (New Source Toxics Rule):

(a) That the input of HAPs including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booth 3 shall be limited to less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs, rolled on a monthly basis.

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall be less than 0.83 tons per month for a single HAP and less than 2.08 tons per month for a combination of HAPs.

Since the HAP emissions are limited to less than 10 tons per year for a single HAP and 25 tons per year for a combination of HAPs, 326 IAC 2-1-3.4 does not apply to Booth 3.

(b) Any change or modification which may increase the HAP emissions above 10 tons per year for a single HAP and/or 25 tons per year for a combination of HAPs shall require prior approval.

D.1.3 PM Process Operations [326 IAC 6-3]:

Pursuant to 326 IAC 6-3 (Process Operations), the paint booths shall have PM allowable emissions using the following equation:

$E = 4.10\ P^{0.67}$; Where: E = PM allowable emissions in pounds hour
P = Process weight rate in tons per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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.1.5 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC and HAP limits specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D 1.6 Volatile Organic Compound (VOC) Compliance Determination

Compliance with the VOC and content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, 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

D.1.7 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the paint booths are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booths are in operation.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

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

(d) 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.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Condition D.1.1 and D.1.2.

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

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 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.

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: Gulf Stream Coach, Inc. PHONE NO. (219)-773-7761

LOCATION: (CITY AND COUNTY) Nappanee/Elkhart
PERMIT NO. 039-9271 AFS PLANT ID: 039-00145 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:_____

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
Compliance Data Section

Quarterly Report

Company Name: Gulf Stream Coach, Inc.
Location: 503 S. Oakland, Nappanee, Indiana 46550
Permit No.: 039-9271-00145
Source: Booths 1-5
Pollutant: VOC PTE
Limit: 129.0 tons per twelve month period

Year: _____

Month	VOC Usage/Emissions (tons/month)	VOC Usage/Emissions for previous month(s) (tons)	VOC Usage/Emissions for twelve month period (tons)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

Quarterly Report

Company Name: Gulf Stream Coach, Inc.
Location: 503 S. Oakland, Nappanee, Indiana 46550
Permit No.: 039-9271-00145
Source: Booth 1
Pollutant: VOC PTE
Limit: Less than 10 tons/yr for a single HAP;
Less than 25 tons/yr for a combination HAPs

Year: _____

Month	Worst Case Single HAP Usage/ Emissions (tons/ month)	Worst Case Single HAP Usage/ Emissions for previous month(s) (tons)	Combination HAPs Usage/ Emissions (tons/ month)	Combination HAPs Usage/ Emissions for previous month(s) (tons)	Worst Case Single HAP Usage/ Emissions for twelve month period (tons)	Combination HAPs Usage/ Emissions for twelve month period (tons)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Gulf Stream Coach, Inc.
Source Location:	503 S. Oakland, Nappanee, In. 46550
County:	Elkhart
Construction Permit No.:	CP-039-9271-00145
SIC Code:	3716
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Gulf Stream Coach, Inc. relating to the construction and operation of paint spray equipment for motor homes and travel trailers, consisting of the following equipment:

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 3, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) exisitng HVLP paint booth, for miscellaneous motor homes and travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, re-designated from Booth 51 to Booth 1, with an increase in emissions, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) exisitng HVLP paint booth, for miscellaneous motor homes and travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, re-designated from Booth 52 to Booth 2, with an increase in emissions, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes and travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 4, with a maximum throughput of 0.25 units/hr, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes and travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 5, with a maximum throughput of 0.25 units/hr, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts tot he atmosphere.

(g) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
V-Bus	Bus Paint Line	35	3.5	16,700	Ambient
V-A	"A" Paint Line	35	3.5	16,700	Ambient
V-A1	"A1" Paint Line	35	3.5	16,700	Ambient
V-R	Repair Paint Line	35	3.5	16,700	Ambient
V-W/R	Warranty Paint Line	35	3.5	16,700	Ambient
V-P	Parts Paint Line	35	3.5	16,700	Ambient
V-P1	Wood Paint Line	35	3.5	16,700	Ambient
H-161	Infra-red heating units	22	0.3	--	Ambient

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 December 4, 1997, with additional information received on September 2, 1998.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (sixteen (16) 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)	11.37	11.37
Particulate Matter (PM10)	11.37	11.37
Sulfur Dioxide (SO_2)	--	0.054
Volatile Organic Compounds (VOC)	--	129.26
Carbon Monoxide (CO)	--	2.86
Nitrogen Oxides (NO_x)	--	11.53
Xylene	--	24.46
Toluene	--	14.09
Methyl Ethyl Ketone	--	12.38
Methyl Isobutyl Ketone	--	2.81
Ethyl Benzene	--	0.88

Glycol Ethers	--	0.21
Combination of HAPs	--	54.83

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. The paint booths shall comply with 326 IAC 6-3-2(c) using the following equation:

E = 4.10P^0.67; where P = process weight in tons per hour
E = rate of emission in pounds per hour.

(b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.

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

(d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for PM_{10}, CO, NO_x and SO_2. 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	9.18
PM10	9.18
SO_2	0.02
VOC	50.04
CO	0.62
NO_x	3.10

(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 construction permit CP-039-2714, issued on August 1, 1994.

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 limit, 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	11.37	11.37	0.054	129.26	2.86	11.53
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-039-7740-00145) application on December 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

(a) There are no New Source Performance Standards 40 CFR Part 60 applicable to this facility.

(b) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability

326 IAC 2-1-3.4 (New Source Toxics Rule) does not apply to the facilities because single HAP potential emissions from each facility are less than 10 ton/yr and combination HAPs from each facility are less than 25 tons/yr.

326 IAC 2-6 (Emission Reporting):

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Opacity Limitations):

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.

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

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The paint booths 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.

326 IAC 8-1-6 (New facilities; general reduction requirements):

326 IAC 8-1-6 does not apply to paint booths V-W, V-R, V-W/R, V-P and V-P1 because potential VOC emissions are less than 25 tons/yr.

Paint booths designated as V-Bus, V-A and V-A1 each have potential volatile organic compounds (VOC) emissions greater than 25 tons per year. Therefore, these facilities, which paint fiberglass and miscellaneous plastic parts, are subject to Best Available Control Technology (BACT) requirements pursuant to this rule. A summary of the BACT review submitted by the source is provided below.

Best Available Control Technology (BACT)

The Best Available Control Technology (BACT) analysis submitted by Gulf Stream Coach, Inc., has been performed in accordance with the USEPA, Office of Air Quality Planning Standards, Draft "Top Down: BACT Guidance" dated March 15, 1990. This analysis of the use of the following:

(a) On-line search of the BACT/LAER Clearinghouse;
(b) Permits from other regulatory agencies;
(c) Permit engineers;
(d) Vendors/suppliers;
(e) Inspection & Performance reports; and
(f) OAQPS control cost manual and trade journals.

The BACT analysis submitted by Gulf Stream Coach, Inc., has been evaluated by the Office of Air Management (OAM). OAM agrees with the chosen controls and/or limits. A summary of the BACT analysis is as follows:

(1) Technologies considered to be technically infeasible for the painting operations:

(a) *Waterborne Coatings* - Paints are reformulated with water replacing organic compounds. The water becomes a carrier solvent in the process, and is evaporated during the drying process. The drying time of waterborne coatings is dependent upon temperature and humidity, with higher humidity necessitating longer drying times. With the addition of a drying oven to properly dry the waterborne coating, the drying time for waterborne coatings is longer and the product cannot be handled as soon as with solvent based coatings. The use of drying ovens is not possible because the products being coated contain components made of heat sensitive materials. According to the USEPA guidance document - 450/2 -78-015, Volume VI, ovens cannot be used in the transportation industry "because these assembled products include heat sensitive materials". In addition, current waterborne coating formulations have experienced loss of gloss and color over time compared with two-component

urethane paint systems. Waterborne coatings do not meet the quality specifications needed to maintain quality products.

(b) *Non-photochemically Reactive Solvents* - Most of the solvents evaluated have been associated with environmental problems (stratospheric ozone depletion for example) or severe health hazards. With the exception of acetone, the Non-photochemically reactive solvents considered are not commonly used in paint formulations. Gulf Stream is currently testing the use of acetone to replace the wash thinner.

(c) *Chemical Scrubber* - Scrubbers are often not a feasible option because waste streams generally contain several components, and thus may require a different solvent for each target chemical. Since each process at Gulf Stream emits several different chemicals, the resulting capture and treatment requirements are considered to effectively eliminate the scrubber system from further consideration.

(d) *Biofiltration* - Biofiltration has been used successfully to control odors in Europe. However, there are only a few applications of biofilters for odor control in the United States. There is no known application of Biofiltration for the removal of VOCs from paint exhaust streams for motor coach production facilities. Biofilters are also usually associated with much lower air volumes; air volumes from the three (3) paint booths are in excess of 150,000 cubic feet per minute. For these reasons, Biofiltration was not evaluated further for use at this time.

(e) *Condensation* - This requires extremely low temperatures (-160 ^{o}F) to achieve any significant reduction (90%) in VOC emissions and is considered to be impractical for these reasons. The low temperature requirement is a result of the very low concentrations of solvents existing in the exhaust streams.

(2) Technologies considered to be technically feasible for the painting operations:

(a) *High Volume Low Pressure (HVLP) Paint Application* - HVLP spray equipment will be used to apply finish coatings in all production operations. HVLP spray equipment has been shown to reduce paint usage substantially over other conventional spray systems.

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.

(b) *Work Practices* - Gulf Stream has a spill response plan and pollution prevention plan. Housekeeping practices that have been introduced to reduce VOC include:

1. Sealed lids on all containers not in use;
2. Cup gun purging into approved containers;
3. Using water based cleaners where effective and practical; and
4. Maintenance on spray equipment to prevent loss of product.

(c) *Recycler* - Collected solvents will be recycled on site to recover reusable solvents and minimize waste. The Recycler is a 55 gallon batch Recycler a water jacket condenser and has a 95% collection efficiency.

(d) *Carbon Adsorption* - There are several process and waste stream related factors which adversely affect the use of carbon adsorption for VOC control. The control efficiency is questionable for multiple solvents present at low concentrations as they are in the overall process and it is impractical to recover these solvents from multi-component and two-phase mixtures. Carbon adsorption has an inadequate capacity for methanol and possibly other solvent components which require large carbon beds and/or frequent regenerations because they are not readily adsorbed at low concentrations. There are also safety hazards associated with ketones and other solvents such as fire and explosion. The system would require steam supply for regeneration and create wastewater containing soluble organics as a result.

(e) *Catalytic Incineration* - Although incinerators can be used for the destruction of most solvents present in complex mixtures, they are not suitable for treatment of waste streams containing halogenated organics. With the absence of halogenated materials, catalytic incineration is viable for the majority of streams at Gulf Stream.

(f) *Thermal Incineration* - Thermal incineration is the one whose VOC efficiency is at least affected by waste stream characteristics. The combustion of halogenated organics, however, will result in HCL emissions which must be removed by a caustic scrubber. Due to the intermittent nature of the operation and low heating value of the waste stream, high fuel consumption is required and will result in additionally NO_x and CO emissions to the environment.

(g) *Fibril Technology* - The sole use of this technology is for thermoplastics, not thermoset plastics, such as styrene fiberglass. The Indiana Clean Manufacturing Technology and Safe Materials Institute has reviewed usage for thermoset applications. Only one company makes fibrils and this company and they have maintained that they cannot service new markets because all production has been back-logged to one company.

(h) Carbon Black - Carbon Black is an alternative to Fibrils. CMTI has reviewed this additive for numerous industries. Typically, carbon black does not meet the quality specifications need in the transportation industry. The plastic's performance characteristics are compromised because such large quantities of carbon black are needed.

Utilizing the operating parameters, emission profiles and flow rates as a preliminary design basis, capital and annualized costs for each of the control technologies under consideration (thermal incineration and carbon adsorption) were prepared. Baseline costs were developed for each technology for waste streams with flow rate 150,000 SCFM, representing flows for the combined discharge of the three (3) paint booths. Costs were then developed for the two (2) control options. These options were then compared to a third option, the operation of the plant without add-on controls, to arrive at a determination of BACT for VOC emissions from the proposed paint booths. Relative cost (dollars per ton of VOC removed) of the technologies compared to the option of no add-on controls along with initial capital costs of the installed equipment are presented in the following table:

Control Technology	Relative Cost ($/ton VOC removed)	Capital Cost ($)
Carbon Adsorption	8,031	2,059,791
Thermal Incineration	20,678	4,901,990
No controls	0.00	0.00

On the basis of cost effectiveness, carbon adsorption would appear to represent the technology of choice. However, the cost effectiveness of carbon adsorption is still excessively high, its performance is suspect and there are other environmental and safety aspects which cast doubt on its viability.

(3) The control technologies evaluated in this study of VOC emissions from the Gulf Stream source in Nappanee, Indiana, were coating transfer efficiency enhancement, coating reformulation and add-on controls.

Gulf Stream actively pursues VOC reduction through the use of transfer efficiency enhancement. Although additional VOC reductions through these techniques can be anticipated in the future, the coatings and application method now being used by Gulf Stream represent the best available based on product acceptability and environmental impact.

Add-on control measures based on the incinerator technology appears capable of achieving significant reductions in VOC emissions. However, enormous costs are incurred and, in addition, there are environmental and safety risks. The performance of the third technology studied, carbon adsorption, is highly questionable for a number of reasons including the presence of multiple VOCs within the waste streams, the nature of some constituents which are not readily adsorbed by carbon, the potential for fire and explosion posed by other constituents like ketones, the low concentration of many of the constituents, the absence of a steam source, and the potential problem wastewater discharges. All of these factors impair performance and acceptability of the technology. Also, excessive costs are incurred in implementing carbon adsorption.

Based on the above analysis, the Best Available Control Technology (BACT), for each process is as follows:

(a) Use of the following work practices to minimize leaks, spills and evaporative losses:

1. Water-based, non-VOC/HAP, cleaners shall be utilized for pre-paint cleaning and elsewhere when considered effective and practical.

2. The cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

3. Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

4. The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

5. All solvent sprayed during cleanup or color 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.

6. Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(b) The source shall be required to continue testing of non-VOC/HAP clean-up solvents to replace the use of the laquer thinner.

(c) Collected solvents will be recycled on-site to recover reusable solvents and minimize waste.

(d) The method of application for the three (3) paint booths shall be done with high volume-low pressure (HVLP) spray technique.

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 paint booths shall comply with the following:

1. Shall not exceed 5.64 pounds of VOC per gallon coating less water for the primer/sealer;
2. Shall not exceed 6.29 pounds of VOC per gallon coating less water for the base coat; and
3. Shall not exceed 4.41 pounds of VOC per gallon coating less water for the top coat.

(4) On September 14, 1998, OAM investigated existing BACT determinations made in the last five (5) years for similar sources utilizing the EPA RBLC (RACT/BACT/LAER Clearinghouse). No existing BACT determinations were found in this search based on the SIC code (3716) and the pollutant emitted (VOC).

326 IAC 8-2-10 (Flat wood panels; manufacturing operations) does not apply to the wood paint line because the potential to emit from the wod paint booth facility is less than 15 pounds per day.

No other 326 IAC 8 rules 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 not 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) See attached spreadsheets for detailed air toxic calculations.

(c) 326 IAC 2-1-3.4 (New Source Toxics Control) does not apply to the paint booths because each paint booth emits less than 10 tons per year for a single HAP and less than 25 tons per year for a combination HAPs.

Conclusion

The construction of the paint spray equipment for motor homes and travel trailers will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-9271-00145.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation and Enhanced New Source Review (ENSR)

Source Name:	Gulf Stream Coach, Inc.
Source Location:	503 S. Oakland, Nappanee, Indiana 46550
County:	Elkhart
Construction Permit No.:	CP-039-9271-00145
SIC Code:	3716
Permit Reviewer:	Nysa L. James

On October 9, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Tribune, 421 South Second Street, Elkhart, Indiana, stating that Gulf Stream Coach, Inc. had applied for a construction permit to construct and operate paint spray equipment for motor homes, buses, vans, pick-up trucks, travel trailers and production parts with 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.

On October 30, 1998, Gulf Stream Coach, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: Section A.1 and B.9 refer to the operations of Gulf Stream Coach as “utility trailer fabrication and assembly”. Gulf Stream Coach performs no utility trailer operations. The source would like this to be corrected to “motor home, bus, van, pick-up truck, and travel trailer fabrication and assembly operation”.

Response 1: Condition A.1, General Information located on page 4 of 19, and Condition B.9, Transfer of Permit located on page 8 of 19, are amended to the following (changes are bolded and crossed out for emphasis):

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a ~~utility trailer~~ **motor home, bus, van, pick-up truck, and travel trailer** fabrication and assembly operation.

Responsible Official:	Brian Shea
Source Address:	503 S. Oakland, Nappanee, IN. 46550
Mailing Address:	P.O. Box 1005, Nappanee, IN. 46550
SIC Code:	3716
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules
	Major Source, under Title V Rules

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this ~~utility trailer~~ **motor home, bus, van, pick-up truck, and travel trailer** fabrication and assembly operation 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.

Comment 2: Section A.2, D.1 (Pages 4-5, 14), Pages 1-2 of the TSD requires revised descriptions for the facilities listed in the draft permit. Gulf Stream requests that the noted sections be revised as follows:

(a) One (1) new HVLP paint booth, for miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 3, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-3.

(b) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, re-designated from Booth 51 to Booth 1, with an increase in emissions, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-1.

(c) One (1) existing HVLP paint booth, for miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, re-designated from Booth 52 to Booth 2, with an increase in emissions, with a maximum throughput of 1.0 units per hour for motor homes, 0.25 units per hour for buses, 2.0 units per hour for vans and pickup trucks, or 0.25 units per hour for travel trailers, dry filters for PM/PM_{10} control and exhausts to three (3) stacks designated as S-2.

(d) One (1) HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 4, with a maximum throughput of 0.25 units/hr, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.

(e) One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, travel trailers, buses, vans, pick-up trucks, travel trailers and production parts, designated as Booth 5, with a maximum throughput of 0.25 units/hr, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.

(f) Existing caulking, sealant, and rubber roofing operations with an increase in emissions.

(g) Two (2) air atomization metal lamination booths (Lam #1 and #2) controlled by dry filters and exhausts to two (2) stacks per lamination booth designated as L-1 and L-2.

(h) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each.

(i) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-*P.*

Response 2: The Office of Air Management (OAM) shall amend the equipments' descriptions listed in the draft construction permit to what is requested by the source. According to the source's emission calculations of the existing caulking, sealant, and rubber roofing operations, the operations could potentially emit 15.71 tons per year, which is less than what was previously permitted (24.5 tons per year) under CP-039-2714, issued on August 1, 1994. Therefore, it is not necessary to review these operations and they shall not be included in this construction permit. The existing lamination booths shall not be included in this construction permit because there are no increases in emissions from what has already been previously permitted (CP-039-2714). The Part 70 Operating permit shall consist of the entire source's operations. This construction permit shall only include new or modified facilities. Since the source has decided to eliminate the paint booths for miscellaneous parts and wood parts, those descriptions shall be removed. Condition A.2, Emission Units and Pollution Control Equipment Summary located on page 4 and 5 of 19, and D.1, Facility Description located on page 14 of 19, are amended to the following (changes are bolded and crossed out for emphasis):

(a) One (1) **new** HVLP paint booth, for miscellaneous motor home**s, buses, vans, pick-up trucks, travel trailers or production** ~~and utility trailer~~ parts, designated as ~~V-BUS line~~ **Booth 3,** with a maximum throughput of ~~0.07 units/hr~~ **1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers** , ~~a maximum paint usage of 9.21 lb/hr~~, dry filters for PM/**PM_{10}** control and exhausts to three (3) stacks designated as ~~V-BUS~~ **S-3**.

(b) One (1) **existing** HVLP paint booth, for miscellaneous motor home**s, buses, vans, pick-up trucks, travel trailers or production** ~~and utility trailer~~ parts, designated as ~~V-A line~~ **Booth 1, with an increase in emissions,** a maximum throughput of ~~0.22 units/hr~~ **1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers**, ~~a maximum paint usage of 11.65 lb/hr,~~ dry filters for PM/**PM_{10}** control and exhausts to three (3) stacks designated as ~~V-A~~ **S-1**.

(c) One (1) **existing** HVLP paint booth, for miscellaneous motor home**s, buses, vans, pick-up trucks, travel trailers or production** ~~and utility trailer~~ parts, designated as ~~V-A1 line~~ **Booth 2,** with **an increase in emissions,** a maximum throughput of ~~0.22 units/hr~~ **1.0 unit per hour for motor homes, 0.25 unit per hour for buses, 2.0 units per hour for vans and pick-up trucks, or 0.25 unit per hour for travel trailers**, ~~a maximum paint usage of 11.65 lb/hr,~~ dry filters for PM/**PM_{10}** control and exhausts to three (3) stacks designated as ~~V-A1~~ **S-2**.

(d) ~~One (1) HVLP paint booth, for miscellaneous wood parts, designated as the V-P1 line with a maximum throughput of 0.44 units/hr, a maximum paint usage of 1.09 lb/hr, dry filters for PM control and exhausts to one (1) stack designated as V-P1.~~ **One (1) new HVLP paint booth, for miscellaneous repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 4, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-4.**

(e) ~~One (1) HVLP paint booth, for miscellaneous motor home and utility trailer repair parts, designated as the V-R line with a maximum throughput of 0.18 units/hr, a maximum paint usage of 0.32 lb/hr, dry filters for PM control and exhausts to one (1) stack designated as V-R.~~ **One (1) new HVLP paint booth, for miscellaneous warranty repairs of miscellaneous motor homes, buses, vans, pick-up trucks, travel trailers or production parts, designated as Booth 5, with a maximum throughput of 0.25 unit per hour, dry filters for PM/PM_{10} control and exhausts to one (1) stack designated as S-5.**

(f) ~~One (1) HVLP paint booth, for miscellaneous motor home and utility trailer warranty parts, designated as the V-W/R line with a maximum throughput of 0.18 units/hr, a maximum paint usage of 0.06 lb/hr, dry filters for PM control and exhausts to one (1) stack designated as V-W/R.~~ **Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each and exhausts to the atmosphere.**

(g) ~~One (1) HVLP paint booth, for miscellaneous motor home and utility trailer parts, designated as the V-P line with a maximum throughput of 0.31 units/hr, a maximum paint usage of 0.1 lb/hr, dry filters for PM control and exhausts to one (1) stack designated as V-P.~~ **Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161.**

~~(h) Eight (8) air make-up units with a maximum heat input capacity of 2.2 mmBtu/hr each.~~

~~(i) Seventeen (17) infra-red heating units, with a maximum heat input capacity of 0.10 mmBtu/hr each and exhausts to a stack designated as H-161. to a stack designated as H-161.~~

The Office of Air Management (OAM) corrects errors in the permit in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 3: Gulf Steam has revised Form W-1 for all surface coating operations. The air make-up units and infra-red heating units are unchanged from the draft permit. Gulf Stream seeks the operational flexibility to produce any combination of motor homes, buses, vans, pick-up trucks or travel trailers on any one of the three paint booths identified as Booths 1, 2, and 3.

Because the potential emissions and the gallons of material per hour from the painting of the vans and pick-up trucks are the greatest of any individual production item, the potential emissions are based upon this product only. Gulf Stream Coach requests a limited potential to emit VOCs of 129.26 tons per year based upon its actual balanced production requirements and potential operating hours. Because the current permit allowable VOC emissions are 50.04 tons per year, the total VOC potential to emit from this source upon issuance of this construction permit will be 179.30 tons per year. A summary of the Total Potential VOC emissions for the existing, new and modified operations are listed on page 4 of 9 of the source's comments.

Response 3: The revised W-1 forms significantly increases the potential VOC and HAPs emissions. Since the source has decided to take a PTE limit of 129.26 tons per year, this shall be incorporated into the BACT analysis. Based on the limited VOC PTE, the costs analysis shall remain unchanged. Therefore, it is still not economically feasible for the source to operate a control device for paint booths designated as Booths 1, 2 and 3. The total potential and allowable emissions table, located on pages 2 and 3 of the TSD, is amended to the following (changes are bolded and crossed out for emphasis):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	~~11.37--~~	~~11.37~~ **63.3**
Particulate Matter (PM10)	~~11.37--~~	~~11.37~~ **63.3**
Sulfur Dioxide (SO_2)	--	0.054
Volatile Organic Compounds (VOC)	–	~~129.26~~ **823.2**
Carbon Monoxide (CO)	--	2.86
Nitrogen Oxides (NO_x)	–	11.53
Xylene	--	~~24.46~~ **161.1**
Toluene	--	~~14.09~~ **88.92**
Methyl Ethyl Ketone	--	~~12.38~~ **62.31**
Methyl Isobutyl Ketone	--	~~2.81~~ **16.47**
Ethyl Benzene	--	~~0.88~~ **3.12**
~~Glycol Ethers~~	**--**	~~0.21~~
Combination of HAPs	–	~~54.83~~ **331.92**

Condition D.1, Volatile Organic Compounds (New Facilities; general reduction requirements) [326 IAC 8-1-6] located on pages 14 and 15 of the construction permit, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.1 Volatile Organic Compounds (New Facilities; general reduction requirements) [326 IAC 8-1-6]

(a) Paint booths designated as ~~V-Bus, V-A and V-A1~~ **Booths 1, 2 and 3** each have potential volatile organic compounds (VOC) emissions greater than 25 tons per year. Therefore, these facilities are subject to Best Available Control Technology (BACT) requirements pursuant to this rule.

(b) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the above mentioned facilities shall be the following:

(1) Use of the following work practices to minimize leaks, spills and evaporative losses:

(a) Water-based, non-VOC/HAP, cleaners shall be utilized for pre-paint cleaning and elsewhere when considered effective and practical.

(b) The cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(c) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(d) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(e) All solvent sprayed during cleanup or color 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.

(f) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(2) The source shall be required to continue testing of non-VOC/HAP clean-up solvents to replace the use of the laquer thinner.

(3) Collected solvents will be recycled on-site to recover reusable solvents and minimize waste.

(4) The method of application for the three (3) paint booths shall be done with high volume-low pressure (HVLP) spray technique.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) The paint booths shall comply with the following **individual limits**:

(a) Shall not exceed 5.64 pounds of VOC per gallon coating less water for the primer/sealer;

(b) Shall not exceed 6.29 pounds of VOC per gallon coating less water for the base coat; and

(c) Shall not exceed 4.4~~1~~**5** pounds of VOC per gallon coating less water for the top coat.

(6) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booths 1-5 shall be limited to 129 tons per year, rolled on a monthly basis.

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 10.75 tons per month.

Since the source has decided to remove the wood paint booth, the language listed under Condition D.1.2 shall be deleted.

With the increase in emissions from the revised W-1 forms, Booth 3 is now subject to 326 IAC 2-1-3.4 (New Source Toxics Rule). The source shall take a limit of less than 10 tons per year for a single HAP and less than 25 tons per year for a combination HAPs to not be applicable to 326 IAC 2-1-3.4 (New Source Toxics Rule). Condition D.1.2 is now amended to the following (changes are bolded and crossed out for emphasis):

D.1.2 ~~326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)~~ **326 IAC 2-1-3.4 (New Source Toxics Rule)**:

(a) ~~The wood painting line is not subject to 326 IAC 8-2-10 because the potential VOC emissions are less than 15 pounds per day.~~ **That the input of HAPs including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of Booths 3 shall be limited to less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs, rolled on a monthly basis.**

During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall be less than 0.83 tons per month for a single HAP and less than 2.08 tons per month for a combination of HAPs.

Since the HAP emissions are limited to less than 10 tons per year for a single HAP and 25 tons per year for a combination of HAPs, 326 IAC 2-1-3.4 does not apply to Booth 3.

(b) Any change or modification which may increase the **HAP emissions above 10 tons per year for a single HAP and/or 25 tons per year for a combination of HAPs** ~~actual emissions above 15 pounds per day~~ shall require prior approval.

Comment 4: Condition B.8(b) should be reworded to clarify that the requirement to report a malfunction becomes applicable only if the malfunction results in a violation of applicable air pollution control regulations or applicable emission limitations. This point is clearly presented in paragraph (a) of the condition. Without the suggested narrowing of the paragraph (b), reporting would presumably be necessary whenever a malfunction lasts more than one hour, even though no regulations or applicable emission limitation are violated. This is not the intent of 326 IAC 1-6-2.

Response 4: Condition B.8, Malfunctions Report [326 IAC 1-6-2] located on page 7 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

B.8 Malfunctions Report [326 IAC 1-6-2]

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~~ **b**) 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~~ **c**) 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].

Comment 5: The construction permit regulations pursuant to 326 IAC 2-1 do not authorize or require the inclusion of Compliance Response Plan requirements or Failure to take response Steps found in the Part 70 Operating Permits and this draft permit does not contain any such requirements. Accordingly, the third sentence of Section C.10(c)(4), the third sentence of Section D.1.8(a), and the second, third, and fourth sentences of Section D.1.8(b) should be deleted.

Response 5: Condition C.10(c)(4), General Record Keeping Requirements located on page 12 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard

operating procedures. ~~Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

Condition D.1.8, Monitoring Requirements located on page16 of 19, shall be addressed in the latter portion of this addendum.

Comment 6: This draft construction permit contains no quarterly compliance report or deviation reporting requirements. Gulf Stream requests that all references to these reporting requirements be deleted in paragraphs (a), (b), (e) and (f) of Section C.11.

Response 6: The source is required to submit quarterly reports for Condition D.1.1 and Condition D.1.2. Condition C.11 details the procedure for submitting reporting forms and deviation occurrences. Condition C.11 shall remain unchanged and in effect.

Comment 7: Gulf Stream Coach requests that the work practice associated with the carriage of cleanup rags be clarified by including the word “spent” as follows:”

“Spent” cleanup rags saturated with solvent shall be stored, transported and disposed of in containers that are closed tightly.

Consistent with Section D.1.1(b)(3), this revision will ensure that cleanup solvents are recovered to the extent practical, and that the disposal of hazardous waste will be greatly reduced.

Response 7: Condition D.1.1(b)(3) includes cleanup rags saturated with solvent that are spent and re-used. Therefore, stating “spent” rags in this work practice would eliminate the handling and storage processes of re-used rags. This condition shall remain unchanged and in effect.

Comment 8: Gulf Stream Coach requests that the VOC content specifically allowed for compliance in Condition D.1.1(b)(5) and page 9 of the TSD, shall be replaced with either individual limits or a volume weighted VOC content. The following language is suggested:

“The paint booths shall comply with the following individual limits or with the equivalent volume weighted VOC content average.

In addition, the content provided in paragraph (c) of 4.41 pounds of VOC per gallon coating less water for the top coat should be revised to 4.45 pounds of VOC per gallon based upon the stated density of 8.0 and the stated weight percent volatile of 55.67% for top coat.

Response 8: Condition D.1.1(b)(5) has been revised under Response 3, located on pages 5 and 6 of this addendum. The Office of Air Management (OAM) corrects errors in the permit in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM’s decision in a more detailed manner. This document is not an enforceable document, but an aid to the source’s permit.

Comment 9: Section D.1.2 and page 9 of the TSD include emission units involved in painting of wood parts. Gulf Stream Coach requests that this section be deleted in its entirety.

Response 9: The source's construction permit application includes a paint booth that does marking for wood parts. It is OAM's understanding that the source requests that this facility be removed and that it will be not be constructed under this permit. Condition D.1.2 has been revised under Response 3, located on page 7 of this addendum. The Office of Air Management (OAM) corrects errors in the permit in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 10: Since this draft construction permit contains no "VOC usage limitations" or "VOC emission limits", both phrases should be deleted from Condition D.1.6 and Condition D.1.9(a).

Response 10: At the time of public notice, the paint booths designated as Booths 1-3 had specific coating emission limitations listed in the draft construction permit under Condition D.1.1. With the revision of the W-1 forms, the paint booths designated as Booths 1-5 now have emission/usage limits listed under Condition D.1.1 and Condition D.1.2. Condition D.1.6 and Condition D.1.9 shall remain unchanged and in effect.

Comment 11: The monitoring requirements, listed in Condition D.1.8(a) and (b) and D.1.9(b), associated with the insignificant potential and actual particulate emissions from these paint booths are unreasonable, over-burdensome, and expensive. Each of these individual facilities have a potential to emit and actual particulate emissions far below the allowable emissions. The daily and weekly monitoring and associated record keeping of the filter alignment and integrity, stack visible emissions and presence of overspray on rooftops is excessive and unwarranted. These facilities do not warrant this level of scrutiny. These monitoring and record keeping requirements create a compliance demonstration task which has no commensurate environmental benefit.

To require both daily inspections and observations is redundant and over burdensome. IDEM has determined that these facilities will be in compliance with 326 IAC 6-3 by properly using the 94-95% efficient dry filters listed in the application. Since the filters will be inspected daily and the Preventive Maintenance Plan will require proper placement and replacement, as needed, further daily observations are not needed. In addition, the record keeping pursuant to this daily inspection requirement should be narrowed to requiring a log of only abnormal or faulty conditions. A daily requirement to record that the dry filters are correctly placed and operating properly is unnecessary and a burden to routine maintenance efforts. We request that the requirement for daily observations and record keeping of overspray from facilities be removed in its entirety. Gulf Stream Coach also proposes that the monitoring and record keeping for weekly stack observations be limited to notations of only abnormal observations. These proposed procedures would greatly reduce the voluminous paperwork documentation of normal operating conditions and continue to ensure that all particulate matter controls are operating properly.

Section D.1.8(b) requires "response steps when ..... evidence of overspray of emissions is observed." Even though the emissions are expected to be small, 6% of the overspray will still escape at 94% control efficiency. In addition, D.1.3, Particulate Matter, allows PM emissions based on the equation $E = 4.10P^{0.67}$. To require these facilities to take response steps when "evidence of overspray of emissions is observed" is over burdensome and not consistent with the allowance of PM emissions based on the above equation and 94% control efficiency. Gulf Stream requests that this wording be stricken.

Response 11: Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Condition D.1.8, Monitoring Requirements located on page 16 of 19 is amended to the following (changes are bolded and crossed out for emphasis):

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray while the booth**s** ~~is~~ **are** in operation. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack**s** and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

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

(d) 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.

Condition D.1.9, Record Keeping Requirements located on pages 16 and 17 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC**/HAP** usage limits and/or the VOC**/HAP** emission limits established in Condition D.1.1 and D.1.2.

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

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

Comment 12: As presented in Comment 9, Section D.1.2 is not applicable to these facilities and should be deleted. Consequently, the two references to Condition D.1.2 in Condition D1.9.(a) should be deleted.

Response 12: Condition D.1.2 has been revised under Response 3, located on page 7 of this addendum. This condition now includes an emission/usage limit on Booth 1. This limit has been established, by the source' request, so that 326 IAC 2-1-3.4 (New Source Toxics Rule) is not applicable to Booth 1. Record Keeping Requirements are still valid for this new limit. Therefore, Condition D.1.9 shall remain unchanged and in effect.

Comment 13: Because Condition D.1.1 includes only VOC content limit requirements, a compliance demonstration should be based upon parameters concerning VOC content. There are no VOC emission limits established in Section D.1.1 and we generally use individually compliant coatings. Therefore, D.1.9(a)(1) requirement to record the "amount" of each coating material and solvent used is not applicable and should be deleted. Similarly, data on cleanup solvent is not applicable to the demonstration of compliance with the VOC content limit of Section D.1.1 since the VOC content limits are only for paints. The word "amount" from D.1.9(a)(1) and the last sentence of D.1.9(a)(1) and (a)(4)should be deleted.

Gulf Stream believes that the record keeping of D.1.9(a) 2-6 would not improve the quality of compliance with Condition D.1.1, but only add to record keeping burden. The date the material is used is irrelevant and should be deleted. The VOC usage and emissions per month do not demonstrate compliance with the VOC content limit. D.1.9(a)(5) and (a) (6) should be deleted. Gulf stream Coach does not want to have to calculate the volume weighted VOC content for each month when we would expect to be in compliance with the individual limits. Gulf stream request that this condition be referenced to only when using non-compliant coatings.

Response 13: The limits established under Condition D.1.1 are emission/usage limitations. The amount of material used is a necessary factor in determining the emissions and pounds of VOC per gallon coating less water of the facilities. These values can then be compared to the limits established in the condition and compliance can then be demonstrated. Recording of clean-up solvent information is necessary to show compliance with the overall VOC emission/usage limit of 129.0 tons per year. Since the source is required to report certain limits, the log of the usage dates are necessary for the source and OAM to keep track of how much was used on what date in a compliance period. The VOC usage and emissions per month in necessary in showing compliance with the above mention VOC limit. The source is required to record the volume-weighted VOC content to demonstrate compliance with Condition D.1.1. Even if the source believes they are in compliance, OAM requires verification of such compliance by this type of record keeping. Condition D.1.9 shall remain unchanged and in effect.

The source has three additional comments in regards to the technical support document. The Office of Air Management (OAM) corrects errors in the permit in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit. Corrections have been made to the construction permit by comments already addressed.

Upon further review, OAM has made the following changes (changes are bolded and crossed out for emphasis):

1. Condition A.3(b), part 70 Permit Applicability locate on page 5 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

   This existing source has submitted their Part 70 (T-039-7740-00145) application on December 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application. **If the facilities listed in this construction permit are not listed in the final Part 70 Operating permit, then the source will be required to submit an administrative amendment request to the Part 70 Operating permit before operation can commence.**

2. Condition C.2, Opacity Limitations located on page 9 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

C.2 326 IAC 5 (Opacity Limitations):

Pursuant to 326 IAC 5 (~~Visible Emission~~ **Opacity** Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the ~~visible emissions~~ **opacity** shall meet the following:

(a) ~~visible emissions~~ **opacity** shall not exceed an average of 40% ~~opacity in 24 consecutive readings~~ **any one (1) six (6) minute averaging period**.

(b) ~~visible emissions~~ **opacity** shall not exceed 60% ~~opacity~~ for more than a cumulative total of 15 minutes (60 readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor**) in a 6-hour period.

3. Condition D.1.5, Testing Requirements located on page 16 of 19, is amended to the following (changes are bolded and crossed out for emphasis):

D.1.5 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC and HAP limit specified in Condition D.1.1 **and D.1.2** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

4. Reporting Forms for Condition D.1.1 and Condition D.1.2 are added to the construction permit on the additional pages 20 and 21.

HAP Emission Calculations

Booth 1

Company Name: Gulf Stream Coach, Inc.
Plant Location: 503 S. Oakland, Nappanee, IN. 46550
County: Elkhart
Permit Reviewer: NLJ
Date: 2/4/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer / Sealer	8.7	0.75	2.00	19.00%	5.50%	8.00%	0.00%	0.00%	10.86	3.14	4.57	0.00	0.00
Base Coat	7.2	3.00	2.00	14.00%	10.50%	3.00%	0.00%	0.00%	26.49	19.87	5.68	0.00	0.00
Top Coat	8	1.25	2.00	24.75%	3.00%	6.00%	6.00%	0.00%	21.68	2.63	5.26	5.26	0.00
Chroma Clear Blen	7.2	0.06	0.25	16.00%	28.00%	28.00%	0.00%	0.00%	0.08	0.13	0.13	0.00	0.00
Pre-Paint Cleaner	5.8	0.25	0.25	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Thinner	7	0.25	2.00	27.90%	18.60%	26.80%	1.00%	5.60%	4.28	2.85	4.11	0.15	0.86
Total State Potential Emissions									**52.52**	**28.78**	**19.75**	**5.41**	**0.86**

Total HAPS emissions (ton/yr) = 107.32

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAP Emission Calculations

Booth 3

Company Name: Gulf Stream Coach, Inc.
Plant Location: 503 S. Oakland, Nappanee, IN. 46550
County: Elkhart
Permit Reviewer: NLJ
Date: 2/4/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer / Sealer	8.7	0.75	2.00	19.00%	5.50%	8.00%	0.00%	0.00%	10.86	3.14	4.57	0.00	0.00
Base Coat	7.2	3.00	2.00	14.00%	10.50%	3.00%	0.00%	0.00%	26.49	19.87	5.68	0.00	0.00
Top Coat	8	1.25	2.00	24.75%	3.00%	6.00%	6.00%	0.00%	21.68	2.63	5.26	5.26	0.00
Chroma Clear Blen	7.2	0.06	0.25	16.00%	28.00%	28.00%	0.00%	0.00%	0.08	0.13	0.13	0.00	0.00
Pre-Paint Cleaner	5.8	0.25	0.25	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Thinner	7	0.25	2.00	27.90%	18.60%	26.80%	1.00%	5.60%	4.28	2.85	4.11	0.15	0.86
Total State Potential Emissions									**52.52**	**28.78**	**19.75**	**5.41**	**0.86**

Total HAPS emissions (ton/yr) = 107.32

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAP Emission Calculations

Booth 2

Company Name: Gulf Stream Coach, Inc.
Plant Location: 503 S. Oakland, Nappanee, IN. 46550
County: Elkhart
Permit Reviewer: NLJ
Date: 2/4/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer / Sealer	8.7	0.75	2.00	19.00%	5.50%	8.00%	0.00%	0.00%	10.86	3.14	4.57	0.00	0.00
Base Coat	7.2	3.00	2.00	14.00%	10.50%	3.00%	0.00%	0.00%	26.49	19.87	5.68	0.00	0.00
Top Coat	8	1.25	2.00	24.75%	3.00%	6.00%	6.00%	0.00%	21.68	2.63	5.26	5.26	0.00
Chroma Clear Blen	7.2	0.06	0.25	16.00%	28.00%	28.00%	0.00%	0.00%	0.08	0.13	0.13	0.00	0.00
Pre-Paint Cleaner	5.8	0.25	0.25	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Thinner	7	0.25	2.00	27.90%	18.60%	26.80%	1.00%	5.60%	4.28	2.85	4.11	0.15	0.86
Total State Potential Emissions									**52.52**	**28.78**	**19.75**	**5.41**	**0.86**

Total HAPS emissions (ton/yr) = 107.32

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: Gulf Stream Coach, Inc.
Address City IN Zip: 503 S. Oakland, Nappanee, IN. 46550
CP: 039-9271
Plt ID: 039-00145
Reviewer: NLJ
Date: 2/3/98

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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Primer / Sealer	8.7	64.58%	0.0%	64.6%	0.0%	24.77%	0.75	2.00	5.64	5.64	8.47	203.19	37.08	5.08	22.79	75%
Base Coat	7.2	87.88%	0.0%	87.9%	0.0%	12.12%	3.00	2.00	6.29	6.29	37.75	906.08	165.36	5.70	51.92	75%
Top Coat	8.0	55.67%	0.0%	55.7%	0.0%	38.83%	1.25	2.00	4.46	4.46	11.15	267.55	48.83	9.72	11.48	75%
Chroma Clear Blender	7.2	96.30%	0.0%	96.3%	0.0%	2.80%	0.06	0.25	6.90	6.90	0.10	2.49	0.45	0.00	246.60	100%
Pre-Paint Cleaner	5.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.25	5.83	5.83	0.36	8.75	1.60	0.00	--	100%
Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	2.00	7.03	7.03	3.52	84.36	15.40	0.00	--	100%

State Potential Emissions	**Add worst case coating to all solvents**	**61.35**	**1472.41**	**268.72**	**20.51**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

VOC and Particulate
From Surface Coating Operations
Booth 2

Company Name: Gulf Stream Coach, Inc.
Address City IN Zip: 503 S. Oakland, Nappanee, IN. 46550
CP: 039-9271
Plt ID: 039-00145
Reviewer: NLJ
Date: 2/3/98

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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Primer / Sealer	8.7	64.58%	0.0%	64.6%	0.0%	24.77%	0.75	2.00	5.64	5.64	8.47	203.19	37.08	5.08	22.79	75%
Base Coat	7.2	87.88%	0.0%	87.9%	0.0%	12.12%	3.00	2.00	6.29	6.29	37.75	906.08	165.36	5.70	51.92	75%
Top Coat	8.0	55.67%	0.0%	55.7%	0.0%	38.83%	1.25	2.00	4.46	4.46	11.15	267.55	48.83	9.72	11.48	75%
Chroma Clear Blender	7.2	96.30%	0.0%	96.3%	0.0%	2.80%	0.06	0.25	6.90	6.90	0.10	2.49	0.45	0.00	246.60	100%
Pre-Paint Cleaner	5.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.25	5.83	5.83	0.36	8.75	1.60	0.00	--	100%
Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	2.00	7.03	7.03	3.52	84.36	15.40	0.00	--	100%

State Potential Emissions	**Add worst case coating to all solvents**	**61.35**	**1472.41**	**268.72**	**20.51**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100
8 air make-up units

Company Name: **Gulf Stream Coach, Inc.**
Address City IN Zip: **503 S. Oakland, Nappanee, IN. 46550**
CP: **039-9271**
Plt ID: **039-00145**
Reviewer: NLJ
Date: 2/3/98

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
17.6	154.2

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.06	1.06	0.05	10.79	0.22	2.70

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

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

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
17 infra-red heaters

Company Name: **Gulf Stream Coach, Inc.**
Address City IN Zip: **503 S. Oakland, Nappanee, IN. 46550**
CP: **039-9271**
Plt ID: **039-00145**
Reviewer: NLJ
Date: 2/3/98

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.7	14.9

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.09	0.09	0.004	0.74	0.04	0.16

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

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

Company Name: Gulf Stream Coach, Inc.
Address City IN Zip: 503 S. Oakland, Nappanee, IN. 46550
CP: 039-9271
Plt ID: 039-00145
Reviewer: NLJ
Date: 2/3/98

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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Primer / Sealer	8.7	64.58%	0.0%	64.6%	0.0%	24.77%	0.03	0.25	5.64	5.64	0.04	1.02	0.19	0.03	22.79	75%
Base Coat	7.2	87.88%	0.0%	87.9%	0.0%	12.12%	0.06	0.25	6.29	6.29	0.09	2.27	0.41	0.01	51.92	75%
Top Coat	8.0	55.67%	0.0%	55.7%	0.0%	38.83%	0.13	0.25	4.46	4.46	0.14	3.48	0.63	0.13	11.48	75%
Chroma Clear Blender	7.2	96.30%	0.0%	96.3%	0.0%	2.80%	0.06	0.25	6.90	6.90	0.10	2.49	0.45	0.00	246.60	100%
Pre-Paint Cleaner	5.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.25	5.83	5.83	0.36	8.75	1.60	0.00	--	100%
Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.63	0.25	7.03	7.03	1.11	26.57	4.85	0.00	--	100%

State Potential Emissions **Add worst case coating to all solvents** **1.86** **44.56** **8.13** **0.17**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: Gulf Stream Coach, Inc.
Address City IN Zip: 503 S. Oakland, Nappanee, IN. 46550
CP: 039-9271
Plt ID: 039-00145
Reviewer: NLJ
Date: 2/3/98

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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Primer / Sealer	8.7	64.58%	0.0%	64.6%	0.0%	24.77%	0.03	0.25	5.64	5.64	0.04	1.02	0.19	0.03	22.79	75%
Base Coat	7.2	87.88%	0.0%	87.9%	0.0%	12.12%	0.06	0.25	6.29	6.29	0.09	2.27	0.41	0.01	51.92	75%
Top Coat	8.0	55.67%	0.0%	55.7%	0.0%	38.83%	0.13	0.25	4.46	4.46	0.14	3.48	0.63	0.13	11.48	75%
Chroma Clear Blender	7.2	96.30%	0.0%	96.3%	0.0%	2.80%	0.06	0.25	6.90	6.90	0.10	2.49	0.45	0.00	246.60	100%
Pre-Paint Cleaner	5.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.25	5.83	5.83	0.36	8.75	1.60	0.00	--	100%
Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.63	0.25	7.03	7.03	1.11	26.57	4.85	0.00	--	100%

State Potential Emissions **Add worst case coating to all solvents** **1.86** **44.56** **8.13** **0.17**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Repair Line

Company Name: Gulf Stream Coach, Inc.
Plant Location: 503 S. Oakland, Nappanee, IN. 46550
County: Elkhart
Permit Reviewer: NLJ
Date: 2/4/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer / Sealer	8.7	0.03	0.25	19.00%	5.50%	8.00%	0.00%	0.00%	0.05	0.02	0.02	0.00	0.00
Base Coat	7.2	0.06	0.25	14.00%	10.50%	3.00%	0.00%	0.00%	0.07	0.05	0.01	0.00	0.00
Top Coat	8	0.13	0.25	24.75%	3.00%	6.00%	6.00%	0.00%	0.28	0.03	0.07	0.07	0.00
Chroma Clear Blen	7.2	0.06	0.25	16.00%	28.00%	28.00%	0.00%	0.00%	0.08	0.13	0.13	0.00	0.00
Pre-Paint Cleaner	5.8	0.25	0.25	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Thinner	7	0.63	0.25	27.90%	18.60%	26.80%	1.00%	5.60%	1.35	0.90	1.29	0.05	0.27
Total State Potential Emissions									**1.77**	**1.29**	**1.53**	**0.12**	**0.27**

Total HAPS emissions (ton/yr) = **4.98**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAP Emission Calculations

Warranty Line

Company Name: Gulf Stream Coach, Inc.
Plant Location: 503 S. Oakland, Nappanee, IN. 46550
County: Elkhart
Permit Reviewer: NLJ
Date: 2/4/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer / Sealer	8.7	0.03	0.25	19.00%	5.50%	8.00%	0.00%	0.00%	0.05	0.02	0.02	0.00	0.00
Base Coat	7.2	0.06	0.25	14.00%	10.50%	3.00%	0.00%	0.00%	0.07	0.05	0.01	0.00	0.00
Top Coat	8	0.13	0.25	24.75%	3.00%	6.00%	6.00%	0.00%	0.28	0.03	0.07	0.07	0.00
Chroma Clear Blen	7.2	0.06	0.25	16.00%	28.00%	28.00%	0.00%	0.00%	0.08	0.13	0.13	0.00	0.00
Pre-Paint Cleaner	5.8	0.25	0.25	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Thinner	7	0.63	0.25	27.90%	18.60%	26.80%	1.00%	5.60%	1.35	0.90	1.29	0.05	0.27
Total State Potential Emissions									**1.77**	**1.29**	**1.53**	**0.12**	**0.27**

Total HAPS emissions (ton/yr) = **4.98**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs