

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-49-0011</u>	Source &	<u>motor home manufacturing</u>
Owner:	<u>Fleetwood Motor Homes of</u>	Air	<u>facility, as described herein</u>
	<u>Pennsylvania, Inc.</u>	Cleaning	<u></u>
Address:	<u>Route 487, P.O. Drawer 5</u>	Device:	<u></u>
	<u>Paxinos, PA 17860</u>		<u></u>
Attn:	<u>Jim Nylund</u>	Location:	<u>Ralpho Township</u>
	<u>Environmental Coordinator</u>		<u>Northumberland County</u>

This permit is subject to the following conditions:

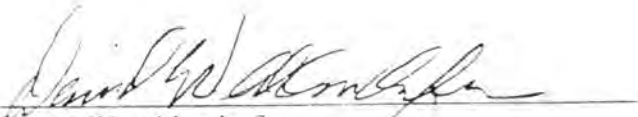
1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

See attached for additional conditions.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: OCT 30 1998

~~Expires: October 31, 2003~~


David W. Aldenderfer
Environmental Program Manager

cc: Harrisburg
RACT Permit File

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- ~~3. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination sources, the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination sources.~~
4. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following motor home manufacturing sources:
 - a. cabinet and trim assembly and staining areas
 - b. sidewall fabrication wiping station
 - c. sidewall fabrication gluing operations
 - d. roof gluing and sealing operations
 - e. windshield gluing and installation area
 - f. motor home exterior cleaning operation
 - g. double coach spray booth
 - h. undercoating station
 - i. glue booth
 - j. touch up spray booth
 - k. miscellaneous application operations
5. ~~The expiration date shown in this operating permit is for state purposes. For Federal enforcement purposes the conditions of this operating permit which pertain to the implementation of the RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA).~~
6. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the sources identified in condition 4 herein shall comply with the provisions of condition 27 herein.

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7. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, any operation at this facility that involves the spray application of any volatile organic compound (VOC)-containing material shall be restricted to the use of airless, air-assisted airless or HVLP spray technologies.
8. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall continue to implement its on-going plan to continually discover, test and use (if acceptable) lower/non-VOC substitute materials for all VOC-containing materials used at the facility. The company shall, on an annual basis, submit to the Department a report that summarizes all new lower/non-VOC containing materials used at the facility and the traditional VOC-containing material the substitute material replaced. This report shall be submitted to the Department by no later than March 31st of each year.
9. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all VOC-containing materials shall be kept in closed containers when not in actual use. All used cleaning rags shall be kept in closed containers while awaiting disposal. No used cleaning rags shall be air-dried. Spray guns shall not be cleaned by spraying cleaning solvent through the gun. All gun lines shall be cleaned by flushing solvent through the lines and into closed containers. No cleaning method of guns, rags, or other applicators shall be employed that promotes the evaporative loss of VOCs to atmosphere.
10. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the use of non VOC-containing adhesives shall be maximized in the cabinet assembly area identified in condition 4a herein. All stains used in the cabinet and trim staining area identified in condition 4a herein shall have a VOC content of not greater than 0.76 pounds per gallon. Additionally, all VOC-containing stains used in this specific operation shall be either dip or hand-applied.
11. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all cleaning materials used in the sidewall fabrication wiping station identified in condition 4b herein shall have a VOC content of not greater than 6.21 pounds per gallon. Under no circumstances shall any of the VOC-containing materials used in this specific operation be spray-applied.
12. Pursuant to the best available technology provisions of Section 127.1 and 127.12 of Chapter 127 and the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all adhesives used in the sidewall fabrication gluing operations identified in condition 4c herein shall have a VOC content of not greater than 0.17 pounds per gallon.

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13. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all adhesives used in the roof gluing operation identified in condition 4d herein shall contain no VOCs. Additionally, all sealants used in the roof sealing operation identified in condition 4d herein shall have a VOC content of not greater than 3.4 pounds per gallon.
14. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all adhesives used in the windshield gluing and installation area identified in condition 4e herein shall have a VOC content of not greater than 4.2 pounds per gallon.
15. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the use of Aqua-mate cleaner or an equivalent cleaner with a VOC content of not greater than 1.34 pounds per gallon shall be maximized in the motor home exterior cleaning operation identified in condition 4f herein. All cleaning solvents used in this specific operation shall have a VOC content of not greater than 6.21 pounds per gallon. Additionally, under no circumstances shall any of the VOC-containing materials used in this specific operation be spray-applied.
16. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coatings used in the first stage spraying operation conducted in the double coach spray booth identified in condition 4g herein (this operation is also identified in AIMS as source 101A) shall have a VOC content of not greater than 4.87 pounds per gallon, as applied.
17. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coatings used in the second stage spraying operation conducted in the double coach spray booth identified in condition 4g herein (this operation is also identified in AIMS as source 101) shall have a VOC content of not greater than 5.65 pounds per gallon, as applied.
18. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coatings used in the undercoating station identified in condition 4h herein shall have a VOC content of not greater than 0.19 pounds per gallon, as applied.
19. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all adhesives used in the glue booth identified in condition 4i herein shall have a VOC content of not greater than 0.58 pounds per gallon unless it is demonstrated to the Department's satisfaction that the use of this adhesive is resulting in countertop delamination problems, in which case Fleetwood is authorized to use adhesives with a VOC content of not greater than 2.08 pounds per gallon.

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20. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coatings used in the touch up spray booth identified in condition 4j herein shall have a VOC content of not greater than 5.65 pounds per gallon, as applied.
21. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the combined VOC emissions from the use of all VOC-containing materials used in the miscellaneous application operations identified in condition 4k herein (this source category is also identified in AIMS as source 109) shall never exceed 25 tons per 12 consecutive month period.
22. Pursuant to the RACT provisions of Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall maintain comprehensive, accurate records of the identities and quantities of all VOC-containing materials used per month in each of the operations identified in conditions 4a through 4k herein. These records shall be retained on site for a minimum of two years and shall be made available to the Department upon request. The Department reserves the right to expand the requirements of this condition.

Conditions 23 through 27 herein pertain to sources previously operated pursuant to Operating Permit #49-318-005C (which is hereby superseded by the issuance of this RACT operating permit).

23. This operating permit is issued for the ~~operation of the chassis and metal parts spray booth (which is not a RACT source)~~.
24. Pursuant to Sections ~~127.1 and 127.12~~ of Chapter ~~127 of Article III~~ of the Rules and Regulations of the Department of Environmental Protection, all VOC-containing coatings used in the chassis and metal parts ~~spray booth~~ shall be applied using either airless, air-assisted airless or HVLP spray technologies.
25. The chassis and metal parts ~~spray booth~~ is subject to the provisions of Section 129.52 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection. The company shall comply with all the provisions of this section.
26. Pursuant to Sections ~~127.1 and 127.12~~ of Chapter ~~127 of Article III~~ of the Rules and Regulations of the Department of Environmental Protection, the company shall not use any methylene chloride-containing materials anywhere ~~in the facility unless the company receives prior written approval from the Department.~~
27. Pursuant to the ~~best-available technology~~ provisions of Section 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the following sources shall comply with the following volatile organic compound (VOC) emissions caps:

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a. ~~the combined VOC emissions from all sources identified in condition 4 herein plus the chassis and metal parts spray booth (102) shall never exceed 150 tons per 12 consecutive month period.~~

b.

Process Step (AIMS Code)	VOC Emission Cap (combined tons per 12 consecutive month period)
cabinet and trim assembly and staining areas (107)	100
sidewall fabrication wiping station (105A)	
sidewall fabrication gluing operations	
roof gluing and sealing operations (106)	
undercoating station (103)	
touch up spray booth	
miscellaneous application operations (109)	

28. ~~The operation of the aforementioned sources shall at all times be conducted in conformance with all conditions contained herein and, additionally, shall not at any time result in the emission of any air contaminant in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.~~
29. ~~The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection or in excess of the limitations specified in any condition contained herein or which otherwise results in, or may possibly be resulting in, noncompliance with the requirements specified in any condition contained herein.~~
30. ~~If a subject source is taken out of operation for a period of one year or more during the term of this operating permit, the permittee shall not thereafter resume operation of the respective source in a manner which is contrary to the requirements specified in Section 127.11a of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection.~~
31. ~~Any notification required as a result of any condition herein should be directed to: Mark Donovan, Air Quality Specialist, 208 West Third Street, Suite 101, Williamsport, PA 17701-6448, telephone 717-327-3705~~