

**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY**

**All American Homes of Indiana, LLC
Plant 1 - 1418 South 13th Street
Plant 2 - 309 South 13th Street
Decatur, Indiana 46733**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T001-11466-00049	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary modular home manufacturing operation.

Responsible Official:	John Helm, Vice President and General Manager
Source Address:	1418 South 13 th Street, Decatur, Indiana 46733 - Plant 1 309 South 13 th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address:	1418 South 13 th Street, Decatur, Indiana 46733
SIC Code:	2452
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

This stationary modular home manufacturing company consists of two (2) plants:

- (a) Plant 1 (ID # 001-00049) is located at 1418 South 13th Street, Decatur, IN 46733; and
- (b) Plant 2 (001-00050) is located at 309 South 13th Street, Decatur, IN 46733.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit. For tracking purposes, one (1) Title V permit will be issued, with a Plant ID of 001-00049.

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

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

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;
- (c) One (1) paint spray coating operation at Plant 2, constructed in 1970, using an air assisted airless spray gun application system, coating a maximum of 0.5 modular home drywall components per hour, exhausting inside the plant;
- (d) One (1) caulking operation at Plant 2, constructed in 1970, using caulk guns to apply adhesives and sealants to a maximum of 0.5 modular home components per hour, exhausting inside the plant; and

- (e) One (1) woodworking operation at Plant 1, processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes; and
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

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

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

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

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

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

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment are in operation.
- C.7 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

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

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
 - (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
 - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 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 estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;
- (c) One (1) paint spray coating operation at Plant 2, constructed in 1970, using an air assisted airless spray gun application system, coating a maximum of 0.5 modular home drywall components per hour, exhausting inside the plant;
- (d) One (1) caulking operation at Plant 2, constructed in 1970, using caulk guns to apply adhesives and sealants to a maximum of 0.5 modular home components per hour, exhausting inside the plant.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the paint spray coating and caulking operation at Plant 1 shall be the following work practices and limitation:

- (a) All architectural paint coatings will be applied with brushes, rollers or air assisted airless spray guns, or equivalent spray applicators at least as efficient.
- (b) Any storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) Coatings shall be used that contain the lowest levels of VOCs possible, while still meeting customer quality, performance and price objectives. Exempt solvents such as water and acetone shall be used to the greatest degree practicable.
- (d) The VOC usage for the paint spray coating and caulking operation at Plant 1 shall be limited to 60 tons per twelve (12) consecutive month period.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from each of the paint spray coating operations at Plant 1 and Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) paint spray coating operation at Plant 1 and the one (1) paint spray coating operation at Plant 2.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1(d) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.5 VOC Emissions

Compliance with Condition D.1.1(d) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(c) and D.1.1(d), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1(c) and D.1.1(d).

- (1) The amount and VOC 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 cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.

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

D.1.7 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) One (1) woodworking operation at Plant 1, processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Plant 1 woodworking operation shall not exceed 11.8 pounds per hour when operating at a process weight rate of 9,700 pounds per hour.

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

In order to comply with D.2.1, the baghouse for PM control shall be in operation and control emissions from the Plant 1 woodworking operation at all times that the woodworking operation is in operation.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Plant 1 woodworking operation baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Plant 1 woodworking operation, at least once weekly when the woodworking operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. 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.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the Plant 1 woodworking operation baghouse stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of the dates vents are redirected.

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activity

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: All American Homes of Indiana, LLC
Source Address: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address: 1418 South 13th Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-11466-00049

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: All American Homes of Indiana, LLC
Source Address: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address: 1418 South 13th Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-11466-00049

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12) c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and c The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: All American Homes of Indiana, LLC
Source Address: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address: 1418 South 13th Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-11466-00049
Facility: Surface coating and caulking operation at Plant 1
Parameter: VOC usage
Limit: VOC usage not to exceed 60 tons per twelve (12) consecutive month period

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: All American Homes of Indiana, LLC
Source Address: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address: 1418 South 13th Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-11466-00049

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Name: All American Homes of Indiana, LLC
Source Location: 1418 South 13th Street, Decatur, Indiana 46733 and
309 South 13th Street, Decatur, Indiana 46733
SIC Code: 2452
County: Adams
Operation Permit No.: T001-11466-00049
Permit Reviewer: TE/EVP

On December 20, 2000, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that All American Homes of Indiana, LLC had applied for a Part 70 (Title V) Operating Permit relating to the operation of a modular home manufacturing operation. The notice also stated that OAQ proposed to issue a Title V for this operation and provided information on how the public could review the proposed Title V 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 Title V should be issued as proposed.

On January 23, 2001, Earl Handshoe Jr., Corporate EHS Administrator at All American Homes of Indiana, LLC, submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

The company's name has been changed to All American Homes of Indiana, LLC effective January 1, 2001.

Response 1

The entire permit has been revised to indicate the company's new name.

Comment 2

Condition A.1

This condition should read as follows:

The Permittee owns and operates a stationary modular home manufacturing operation.

Responsible Official: John Helm, Vice President and General Manager
Mailing Address: 1418 South 13th Street, Decatur, Indiana 46733

Response 2

The following changes have been made to Condition A.1.

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

The Permittee owns and operates a stationary modular home manufacturing operation.

Responsible Official:	Steve Kerr John Helm , Vice President and General Manager
Source Address:	1418 South 13 th Street, Decatur, Indiana 46733 - Plant 1 309 South 13 th Street, Decatur, Indiana 46733 - Plant 2
Mailing Address:	1418 South 13 th Street, Decatur, Indiana 46733
SIC Code:	2452
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

Comment 3

Condition A.2

Facilities are considered one source if they meet all three of the following:

1. Are located on one piece of property or on contiguous or adjacent properties.
2. Are owned or operated by the same person (or by person under common control)
3. For sources on contiguous properties; have the same SIC or are considered a support facility (>50% output directed to either side). For sources on adjacent property; have the same SIC and are considered a support facility (>50% output directed to either site).

All American Homes plants #1 & #2 combined under draft permit number T001-11466-00049 are located on adjacent properties and operate independently. Neither plant serves as a support facility with >50% of the output directed to the other. Based on the location and autonomous operation of these sources, All American Homes of Indiana, LLC Plant #1, and All American Homes of Indiana, LLC Plant #2 do not meet IDEM's definition of a single source. Please process the OAM Operation Permit applications as separate sources.

Response 3

All American Homes of Indiana, LLC is under common ownership and control. Plant #1 and Plant #2 have the same SIC code. Since both Plant #1 and Plant #2 have the same SIC code, there is no need to evaluate how much output is directed to either plant. Also, both plants are on the same public road and only one mile apart. Therefore the determination that plants #1 and #2 should be considered as one source will not change. No changes were made to the permit as a result of this comment.

Comment 4

Condition A.5

Based upon comment number 3, paragraph (a) is not correct in stating that this facility is a major source, as defined in 326 IAC 2-7-1(22).

All American Homes of Indiana, LLC Plant #1 has potential emissions for VOC 60 TPY and individual HAP potential at <10 TPY and all HAP combined at <25 TPY.

All American Homes of Indiana, LLC Plant #2 has potential emissions for VOC 45 TPY and individual HAP potential at <10 TPY and all HAP combined at <25 TPY.

Individually these sources are considered minor sources of air emissions.

Response 4

The Title V permit includes both Plant #1 and Plant #2. The combined uncontrolled VOC emissions of Plant #1 and Plant #2 are above 100 tons/year. Any source that has uncontrolled VOC emissions greater than 100 tons/year is considered a major source for Title V applicability. No changes have been made to the permit as a result of this comment.

Comment 5

Condition D.1.1

Consistent with comment numbers 3 and 4, paragraph (d) should read as follows:

(d) The VOC usage for the paint spray coating and caulking operation at Plant #1 shall be limited to 60 tons per twelve (12) month period. The VOC usage for the paint spray coating and caulking operation at Plant #2 shall be limited to 45 tons per twelve (12) month period.

This statement would not be correct even if both application were combined since the PTE from both facilities is 105 TPY and this permit only allows 60 TPY from Plant #1.

Response 5

The paint spray coating and caulking operation at Plant 2 is not subject to the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) because, although potential VOC emissions are greater than 25 tons per year, this facility, constructed and operated in 1970, was constructed prior to January 1, 1980 (the applicability date of this rule). Thus there is no VOC limit for the paint spray coating and caulking operation at Plant 2. The paint spray coating and caulking operation at Plant 1 is limited to 60 tons per year because that was determined to be BACT for the process. No changes have been made to the permit as a result of this comment.

Comment 6

Condition D.1.3

A Preventive Maintenance Plan should not be required for this facility and any control devices. What preventive maintenance could be performed on hand-held caulk guns to ensure that they are working properly? Also, concerning the air assisted airless spray gun, brushes or rollers, there is no preventive maintenance that could be performed to ensure that they are functioning properly. The fail position for the air assisted airless spray gun would not allow any material to be sprayed; therefore no emissions could come from it.

Response 6

The PMP is not required for the caulk guns at Plant 1 or Plant 2, but one is required for the spray coating operation at Plant 1 and Plant 2. The following changes have been made to Condition D.1.3 in order to reflect the change.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility and any control devices.~~ **the one (1) paint spray coating operation at Plant 1 and the one (1) paint spray coating operation at Plant 2.**

Comment 7

Page 32 of 37

Source name should be changed to All American Homes of Indiana, LLC.

Response 7

The Certification Form has been revised to indicate the new name of the source.

Comment 8

Page 33 of 37

Source name should be changed to All American Homes of Indiana, LLC.

Also the address should only list the address for the individual plant that this form is for.

Response 8

The Emergency Occurrence Report has been revised to indicate the new name of the source.

The addresses of Plant 1 and Plant 2 are listed because this Title V permit includes both the plants.

Comment 9

Page 35 of 37

Source name should be changed to All American Homes of Indiana, LLC.

The address should only list the address for the individual plant that this form is for.

The facility should be changed to list the individual plant that it is required for.

The limit should be consistent with comment number 5.

Response 9

The Quarterly Report has been revised to indicate the new name of the source.

The addresses of Plant 1 and Plant 2 are listed because this Title V permit includes both the plants.

The paint spray coating and caulking operation at Plant 2 is not subject to the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) because, although potential VOC emissions are greater than 25 tons per year, this facility, constructed and operated in 1970, was constructed prior to January 1, 1980 (the applicability date of this rule). Thus there is no VOC limit for the paint spray coating and caulking operation at Plant 2.

Comment 10

Page 36 of 37

Source name should be changed to All American Homes of Indiana, LLC.

The address should only list the address for the individual plant that this form is for.

Response 10

The Quarterly Deviation and Compliance Monitoring Report has been revised to indicate the new name of the source.

The addresses of Plant 1 and Plant 2 are listed because this Title V permit includes both the plants.

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. The Part 70 permit has been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: All American Homes - Indiana, Inc.
Source Locations: 1418 South 13th Street, Decatur, Indiana 46733 and
309 South 13th Street, Decatur, Indiana 46733
County: Adams
SIC Code: 2452
Operation Permit No.: T001-11466-00049
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from All American Homes - Indiana, Inc. relating to the operation of a modular home manufacturing operation.

Source Definition

This modular home manufacturing company consists of two (2) plants:

- (a) Plant 1 (ID # 001-00049) is located at 1418 South 13th Street, Decatur, Indiana 46733; and
- (b) Plant 2 (ID # 001-00050) is located at 309 South 13th Street, Decatur, Indiana 46733.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. For tracking purposes, one (1) Title V permit will be issued, with a Plant ID of 001-00049.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;

- (c) One (1) paint spray coating operation at Plant 2, constructed in 1970, using an air assisted airless spray gun application system, coating a maximum of 0.5 modular home drywall components per hour, exhausting inside the plant;
- (d) One (1) caulking operation at Plant 2, constructed in 1970, using caulk guns to apply adhesives and sealants to a maximum of 0.5 modular home components per hour, exhausting inside the plant; and
- (e) One (1) woodworking operation at Plant 1, processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (1) Fifty-eight (58) natural gas-fired heaters, each having a maximum heat input rating of 0.10 MMBtu per hour;
 - (2) Thirty four (34) natural gas-fired heaters, each having a maximum heat input rating of 0.06 MMBtu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes.
- (g) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (l) Paved and unpaved roads and parking lots with public access.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) The source had the potential to emit VOC above 100 tons per year making it subject to the Part 70 permit program. The source has missed the submission deadline (December 14, 1996) to apply for either a Part 70 or FESOP permit. Thus, an enforcement referral is being included with this permit.
- (c) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

Two (2) administratively complete Minor Source Operating Permit applications (001-11466-00049 and 001-11467-00049) for each of Plants 1 and 2 were received on October 18, 1999. After further review of both Plants it was determined by IDEM that these plants are to be considered as one source which is subject to the Part 70 Permit program. Therefore, the two (2) applications were combined into one (1) Part 70 permit application.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (7 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

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

Pollutant	Potential To Emit (tons/year)
PM	9,847.43
PM-10	9,847.62
SO ₂	0.02
VOC	104.13
CO	2.88
NO _x	3.43

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

HAP's	Potential To Emit (tons/year)
MDI	less than 10
Hexane	less than 10
TOTAL	less than 25

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

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating - Plant 1	20.71	20.71	0.0	59.52	0.0	0.0	0.0
Surface Coating - Plant 2	15.45	15.45	0.0	44.42	0.0	0.0	0.0
Woodworking - Plant 1	24.53	24.53	0.0	0.0	0.0	0.0	0.0
Natural gas combustion from Insignificant Activities	0.07	0.26	0.02	0.19	2.88	3.43	0.07
Total Emissions	60.76	60.95	0.02	104.13	2.88	3.43	0.07

Note: PM10 is assumed to be equivalent to PM for the surface coating and woodworking operations.

County Attainment Status

The source is located in Adams County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

- (c) The requirements of 40 CFR 64 (Compliance Assurance Monitoring) do not apply to this source that is required to obtain a part 70 permit as this source does not use a control device to achieve compliance with any such emission limitation or standard.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of this rule because potential emissions of PM will be limited to less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the paint spray coating and caulking operations at Plant 1 and Plant 2 shall each be limited by the following:

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

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

- (b) Particulate matter emissions from the woodworking operation at Plant 1 shall be limited to 11.8 pounds per hour based on a process weight rate of 9700 pounds per hour. This is based on the following:

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

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

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

The baghouse controlling emissions from the woodworking operation shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Plant 2

The paint spray coating and caulking operation at Plant 2 is not subject to the requirements of this rule because, although potential VOC emissions are greater than 25 tons per year, this facility, constructed and operated in 1970, was constructed prior to January 1, 1980.

Plant 1

The paint spray coating and caulking operation at Plant 1 is subject to the requirements of this rule because the facility was constructed after January 1, 1980 and potential VOC emissions are greater than 25 tons per year. On February 3, 2000 the source submitted a Best Available Control Technology (BACT) analysis for controlling VOC emissions from the paint spray coating and caulking operation at Plant 1. The analysis follows the "top-down" process described in the USEPA's Office of Air Quality Planning and Standards (OAQPS) guidance documents and is based on potential VOC emissions of 60 tons per year from the paint spray coating and caulking operation at Plant 1.

The first step in the BACT analysis was to perform a review of existing control practices listed in the USEPA's RACT/BACT/LAER Clearinghouse (RBLC) database. The records in the RBLC database were analyzed to identify and evaluate prior determinations of BACT for similar manufacturing facilities. There was no process category in the RBLC database for surface coating activities in the modular home manufacturing industry. Therefore, the "Other Surface Coating" process category was reviewed. None of the RACT, BACT, or LAER determinations for facilities or processes in the "Other Surface Coating" process category were directly applicable to the modular home manufacturing and coating operations at the All American Homes - Indiana, Inc. Plant 1.

Since there were no applicable BACT determinations on the USEPA's RBLC database, an assumption was made as to what minimum level of control efficiency would constitute BACT. Based on the majority of BACT determinations made under the "Other Surface Coating" category in the RBLC database, a minimum 90% overall VOC control efficiency would likely be required for an add-on control system to meet what would be considered BACT. Since it is unusual and prohibitively expensive for control device manufacturers to guarantee a control device efficiency above 95%, the VOC capture efficiency must also be at least 95% in order to achieve an overall VOC control efficiency of 90%. To achieve a minimum 95% capture efficiency, a permanent total enclosure (PTE) must be established for the building.

The criteria proposed by the USEPA for the design and operation of a PTE are as follows:

- (a) Access doors and windows in the total enclosure that are not included in the item (e) area determination must be kept closed during all routine operations.
- (b) The interior of the total enclosure must operate at a lower pressure than its surroundings, so that air flows into the enclosure through all natural draft openings at all times.
- (c) The average velocity through all natural draft openings must be at least 200 ft/min. This velocity is calculated by dividing the difference between the rate of any forced make-up air and the exhaust rate by the total cross-sectional area of all natural draft openings.

- (d) Any source of VOC emissions must be located at least four equivalent diameters from any natural draft opening.
- (e) The total area of all natural draft openings must be less than 5 percent of the total surface area of the enclosure's four walls, ceiling and floor areas.

At Plant 1, there are no exhausts or air make-up units because the large magnitude (both in terms of size and quantity) of the products being manufactured requires the frequent use of a large number of overhead doors, many of which are normally open, in order to accommodate the ingress and egress of raw materials and finished products. There are a total of 22 overhead doors at Plant 1. Seven out of the 22 doors experience exceptionally heavy use and are normally open. Their total area was calculated to be 2,408 square feet. The surface area of the walls, floor and ceiling of Plant 1 was calculated to be 413,000 square feet. Therefore, the total surface area of the open doors (which will constitute the Natural Draft Openings (NDOs)) is less than 0.6% of the total surface area of the walls, floor and ceiling. This is well below the 5% criteria established for meeting the definition of PTE.

In order to provide 100% capture of the VOCs evolved and to meet PTE criteria (c) described above, sufficient exhaust must be provided by a control system such that a 200 ft/min inward face velocity is established through each NDO. A total of 481,600 scfm is required to establish a 200 ft/min inward face velocity through the 2,408 ft² of normally open doors (NDOs). This should also result in the establishment of a minimum net negative static pressure of -0.05 inches of H₂O in the building, which satisfies criteria (b) described above. Once these criteria are met, the building surrounding the operations at Plant 1 would be considered a PTE.

Next, identification of all applicable control technologies was performed and included the following:

- (1) Condensation
- (2) Carbon Adsorption
- (3) Liquid Absorption
- (4) Flares
- (5) Catalytic Oxidation
- (6) Thermal Oxidation

Condensation systems are only effective for gas streams containing high concentrations of high molecular weight VOCs. Condensation was determined to be technically infeasible because the exhaust streams at Plant 1 contain very low concentrations of relatively low molecular weight VOCs which will condense only at extremely low temperatures. Such temperatures are achievable only by energy-intensive mechanical refrigeration of the exhaust gas stream.

Carbon adsorption removal systems are effective only for VOCs having molecular weights between approximately 60 and 180. The majority of hydrocarbons used in Plant 1 have molecular weights in the 60 to 100 lb/lb-mole range, therefore they would be amenable to effective adsorption and desorption. However, in order for a solvent recovery system using activated carbon to be cost effective, inlet concentrations should be on the order of 700 ppmv or greater. The average VOC concentrations for Plant 1 are expected to be on the order of 3 ppmv or less.

Therefore, the only technically feasible way to use this control option is to utilize an activated carbon adsorption system as a pre-concentrator, and then thermally desorb the solvents, directing the concentrated stream to a thermal oxidizer for VOC destruction. A carbon adsorption concentrator in conjunction with a thermal oxidation control device will be considered a technically feasible option that will be further evaluated in this BACT analysis.

Liquid absorption refers to the use of wet scrubbers, including packed bed, plate, counter current and cross current designs. The key criteria for liquid absorption to work is the requirement that the gas constituents are soluble in an aqueous sorbate, typically water. At Plant 1, at least half of the VOCs are insoluble in water, therefore liquid absorption is not a technically feasible control option.

Flares are considered technically infeasible in this case because of the low exhaust stream VOC concentrations at Plant 1. The concentration of VOCs in the exhaust must be at or above the lower flammability level.

Catalytic oxidation employs a catalyst bed that initiates oxidation reactions at relatively low temperatures. For the catalyst to be effective, the active sites upon which the VOCs react must be accessible and the catalyst must be active. The build up on non-combustible particles, polymerized materials, or reaction of the catalyst with certain elements can either "mask" or "poison" the catalyst, thus making it unavailable for initiating oxidation reactions. The variability and unpredictability of the paint pigments utilized in Plant 1 create a strong likelihood that compounds may be used which would render a catalytic control device ineffective. It would be difficult to impossible to design a catalytic oxidation system to preclude the possibility of the catalyst being masked or poisoned. Further, given the low concentration of VOCs in the exhaust streams, the temperature rise across the catalyst bed would be so low that a poisoned or masked catalyst would go undetected, since there may not be a significantly discernible change in the temperature rise. Therefore, the performance of the catalytic oxidation system could not be effectively ascertained. As a result of the potential for catalyst masking and poisoning, as well as the inability to monitor the control device performance, catalytic oxidation is not a technically feasible control option.

Thermal oxidation is a reliable and effective control technology that converts gaseous VOCs to carbon dioxide, water and various other products of combustion at relatively high temperatures, typically 1350 - 1800°F. Both recuperative thermal oxidizers and regenerative thermal oxidizers are technologically feasible for application at Plant 1. Therefore, these options will be further evaluated.

The costs of the three technically feasible control options were evaluated following the most recent edition of the USEPA's OAQPS Control Cost Manual, by William M. Vatavuk. The economic analysis anticipates the installation of a single control device for the entire facility, since this is the most cost effective means of control. However, in the case of the recuperative thermal oxidizer, from a functional size limit standpoint, this is problematic. Therefore, multiple 60,000 scfm recuperative thermal oxidizers were selected since 60,000 scfm is their practical upper size limit for a single unit. All analyses are based on 90% control of potential VOC emissions of 60 tons per year. The results of the cost analysis are presented below.

(A) Capital Cost - Add-On Controls for VOC Emissions

Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Oxidizer*	4,325,051	5,622,566	1,340,766	6,963,332
Regenerative Thermal Oxidizer	**	**	**	13,760,664
Carbon Adsorber w/ Recuperative Thermal Oxidizer	4,405,762	5,727,490	1,365,787	7,093,277

* The costs for the Recuperative Thermal Oxidizer represents the total costs for the installation of 8 oxidizers.

** These costs are reflected in the total capital cost for the Regenerative Thermal Oxidizer.

(B) Annual Operating, Maintenance & Recovery Cost - Add-On Controls for VOC Emissions

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Oxidizer*	14,678,556	423,620	1,014,459	16,116,635
Regenerative Thermal Oxidizer	3,492,826	557,784	2,004,735	6,055,345
Carbon Adsorber w/ Recuperative Thermal Oxidizer	1,498,915	320,003	1,032,871	2,851,789

* The costs for the Recuperative Thermal Oxidizer represents the total costs for the installation of 8 oxidizers.

(C) Evaluation - Add-On Controls for VOC Emissions

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
Recuperative Thermal Oxidizer*	60.0	54.0	90	298,456
Regenerative Thermal Oxidizer	60.0	54.0	90	112,136
Carbon Adsorber w/ Recuperative Thermal Oxidizer	60.0	54.0	90	52,811

* The costs for the Recuperative Thermal Oxidizer represents the total costs for the installation of 8 oxidizers.

Methodology:

Emissions removed = (controlled potential VOC emissions) * (control efficiency)

\$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
 - a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
 - b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
 - c) Indirect installation cost: engineering, supervision, construction/field expenses, construction fee, start up, performance test, model study and contingencies.
2. Annual Cost
 - a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
 - b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

Based on the cost estimates presented above, use of any of the add-on controls would be economically infeasible. Therefore, BACT for the surface coating and caulking operation at Plant 1 has been determined to be the following work practices and limitation:

- (a) All architectural paint coatings will be applied with brushes, rollers or air assisted airless spray guns, or equivalent spray applicators at least as efficient.
- (b) Any storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) Coatings shall be used that contain the lowest levels of VOCs possible, while still meeting customer quality, performance and price objectives. Exempt solvents such as water and acetone shall be used to the greatest degree practicable.
- (d) The VOC usage for the paint spray coating and caulking operation at Plant 1 shall be limited to 60 tons per twelve (12) consecutive month period.

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

This source is not subject to the requirements of this rule because the modular home manufacturing operations do not fall under the applicable industrial categories specified under 326 IAC 8-2-9(a).

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Sections 2 through 4 of this rule apply to facilities existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph counties or new facilities constructed after January 1, 1980 located anywhere in the state. Sections 5 through 7 of this rule apply to facilities existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph counties or new facilities constructed after July 1, 1990 located anywhere in the state.

The degreasing operation at Plant 2, which consists of a small parts washer used for maintenance purposes, is not subject to this rule because it began operation in 1970 and is located in Adams County. The degreasing operation at Plant 1, which is also a small parts washer used for maintenance purposes, is subject to 326 IAC 8-3-2 (Cold Cleaner Operation) because it was constructed after January 1, 1980 and prior to July 1, 1990. Pursuant to this rule, the Permittee shall:

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to existing sources (as of January 1, 1980) located in Lake and Marion counties, with potential VOC emissions of 100 tons per year or greater. It also applies to sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions of 100 tons per year or greater. This source, located in Adams County, commenced operation in 1970, therefore, it is not subject to the requirements of this rule.

Testing Requirements

Testing is not required on any of the significant emission units at this source because they do not meet the IDEM, OAM criteria for requiring a stack test.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking operation at Plant 1 has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the Plant 1 woodworking operation baghouse stack shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Plant 1 woodworking operation, at least once weekly when the woodworking operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the Plant 1 woodworking operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. 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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 4,5, and 7).

Conclusion

The operation of this modular home manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T001-11466-00049**.

Appendix A: Emission Calculations Summary

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
 309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Plt ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

Uncontrolled Potential Emissions (tons/year)					
Pollutant	Emissions Generating Activity				TOTAL
	Surface Coating Plant 1	Surface Coating Plant 2	Woodworking* Plant 1	Natural Gas Combustion (Insignificant Activities)	
PM	20.71	15.45	9,811.20	0.07	9,847.43
PM10	20.71	15.45	9,811.20	0.26	9,847.62
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	3.43	3.43
VOC	59.52	44.42	0.00	0.19	104.13
CO	0.00	0.00	0.00	2.88	2.88
total HAPs	0.00	0.00	0.00	0.07	0.07
worst case single HAP	0.00	0.00	0.00	0.06	0.06

Controlled Potential Emissions (tons/year)					
Pollutant	Emissions Generating Activity				TOTAL
	Surface Coating Plant 1	Surface Coating Plant 2	Woodworking* Plant 1	Natural Gas Combustion (Insignificant Activities)	
PM	20.71	15.45	24.53	0.07	60.76
PM10	20.71	15.45	24.53	0.26	60.95
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	3.43	3.43
VOC	59.52	44.42	0.00	0.19	104.13
CO	0.00	0.00	0.00	2.88	2.88
total HAPs	0.00	0.00	0.00	0.07	0.07
worst case single HAP	0.00	0.00	0.00	0.06	0.06

Total emissions based on rated capacity at 8,760 hours/year.

* Potential PM and PM-10 emissions from woodworking were calculated based on a sawdust collection rate of 112 pounds/hr and a baghouse control efficiency of 95%. PM and PM-10 are assumed to be equal.

Since there are no control devices on the surface coating operations or the insignificant activities, uncontrolled emissions equal controlled emissions

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

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Plt ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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	
Paint Spray Guns																	
Paints	11.04	53.00%	42.7%	10.3%	56.5%	30.00%	13.6000	0.670	2.62	1.14	10.39	249.40	45.52	20.71	3.80	90%	
Caulk Guns																	
Sealants	8.51	30.00%	0.0%	30.0%	0.0%	60.00%	0.4700	0.670	2.55	2.55	0.80	19.29	3.52	0.00	4.26	100%	
Adhesives	10.51	9.71%	0.0%	9.7%	0.0%	83.00%	3.5000	0.670	1.02	1.02	2.39	57.43	10.48	0.00	1.23	100%	
State Potential Emissions:											13.59	326.13	59.52	20.71			
Federal Potential Emissions (controlled):																	
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr	
											VOC	PM					
											0.00%	0.00%	13.59	326.13	59.52	20.71	

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)

Transfer Efficiency of paint spray guns was obtained from guidelines provided by ICI Paints (Glidden), a major supplier of architectural coatings, when estimating coverage and usage for their coatings.

Total = Worst Coating + Sum of all solvents used

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

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Plt ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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	
Paint Spray Guns																	
Paints	11.04	53.00%	42.7%	10.3%	56.5%	30.00%	13.6000	0.500	2.62	1.14	7.75	186.12	33.97	15.45	3.80	90%	
Caulk Guns																	
Sealants	8.51	30.00%	0.0%	30.0%	0.0%	60.00%	0.4700	0.500	2.55	2.55	0.60	14.40	2.63	0.00	4.26	100%	
Adhesives	10.51	9.71%	0.0%	9.7%	0.0%	83.00%	3.5000	0.500	1.02	1.02	1.79	42.86	7.82	0.00	1.23	100%	
State Potential Emissions:											10.14	243.38	44.42	15.45			
Federal Potential Emissions (controlled):																	
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr	
											VOC	PM					
											0.00%	0.00%	10.14	243.38	44.42	15.45	

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)

Transfer Efficiency of paint spray guns was obtained from guidelines provided by ICI Paints (Glidden), a major supplier of architectural coatings, when estimating coverage and usage for their coatings.

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Pit ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MDI	MDI Emissions* (ton/yr)
Paint Spray Guns					
Paints	11.04	13.6000	0.670	0.00%	0.00
Caulk Guns					
Sealants	8.51	0.4700	0.670	0.00%	0.00
Adhesives	10.51	3.5000	0.670	9.80%	1.62E-06
Total State Potential Emissions					0.00

METHODOLOGY

Total HAPs: 0.00

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

* Note: Based on emission factors established by the Polyurethane Division of the Society of the Plastics Industry, for applications of such materials, whether open or enclosed, less than 0.015 lbs of MDI is emitted for every million lbs of adhesives or sealants used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
 309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Pit ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MDI	MDI Emissions (ton/yr)
Paint Spray Guns					
Paints	11.04	13.6000	0.500	0.00%	0.00
Caulk Guns					
Sealants	8.51	0.4700	0.500	0.00%	0.00
Adhesives	10.51	3.5000	0.500	9.80%	1.21E-06
Total State Potential Emissions					0.00

METHODOLOGY

Total HAPs: 0.00

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000
 * Note: Based on emission factors established by the Polyurethane Division of the Society of the Plastics Industry, for applications of such materials, whether open or enclosed, less than 0.015 lbs of MDI is emitted for every million lbs of adhesives or sealants used

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

**Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Plt ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.84	68.7

Heat Input Capacity includes 58 heaters, each rated at 0.1 MMBtu/hr at Plant 1 and 34 heaters, each rated at 0.06 MMBtu/hr at Plant 2.

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.26	0.02	3.43	0.19	2.88

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 7 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: All American Homes - Plants 1 and 2
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1
 309 South 13th Street, Decatur, Indiana 46733 - Plant 2
Operation Permit No.: T001-11466
Plt ID: 001-00049
Reviewer: Trish Earls/EVP
Date: October 18, 1999

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.211E-05	4.121E-05	2.575E-03	6.181E-02	1.168E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total (ton/yr)
Potential Emission in tons/yr	1.717E-05	3.777E-05	4.807E-05	1.305E-05	7.211E-05	6.5E-02

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.