

# MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Skyline Homes, Plant 812  
1800 W. Hively Avenue  
Elkhart, Indiana 46515**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-12338-00307	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance 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 Management (OAM). The information describing the source contained in conditions A.1 through A.3 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary manufactured home production plant.

Authorized Individual: **Chuck Mann**  
Source Address: **1800 W. Hively Avenue, Elkhart, Indiana 46515**  
Mailing Address: **P.O. Box 1152, Elkhart, Indiana 46515**  
Phone Number: **219-522-8339**  
SIC Code: **2451**  
County Location: **Elkhart**  
County Status: **Attainment for all criteria pollutants**  
Source Status: **Minor Source Operating Permit**  
**Minor Source, under PSD**

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) woodworking shop equipped with various wood cutting saws with a maximum capacity of one (1) floor per hour and vented to one (1) cyclone with baghouse dust collector and exhausting inside the building.
- (b) One (1) gypsum operation with various cutting saws with a maximum capacity of one (1) floor per hour and vented to another cyclone then to the same baghouse dust collector as the woodworking shop identified in A.2(a).
- (c) Twenty-one (21) natural gas space heaters, heated at a total of 6.3 million British thermal units (MMBtu) per hour, exhausting at twenty-one (21) stacks, identified as Stacks 1 through 21.
- (d) Facility is also using caulks, sealants, cleaners, and other miscellaneous VOC containing materials used to assemble manufactured homes for a maximum of one (1) floor per hour.

**SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**B.1 Permit No Defense [IC 13]**

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

**B.2 Definitions**

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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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

**B.4 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

- (a) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, 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 until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### C.1 PSD Minor Source and Part 70 Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

- (a) The total source limited potential to emit of all criteria pollutants including the proposed modifications is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.
- (c) Any change or modification which may increase potential to emit (as defined in 326 IAC 2-7-1 (29)) of all criteria pollutants more than one hundred (100) tons per year or the potential to emit (as defined in 326 IAC 2-7-1(29)) any single HAP more than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination HAPs more than twenty-five (25) tons per year, shall cause the source to be considered a major source under 326 IAC 2-7-1(22) and 40 CFR Part 70, and shall require approval from IDEM, OAM prior to making the change.

### C.2 Preventive Maintenance Plan [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 (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 Management

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, 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.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.7 Opacity [326 IAC 5-1]**

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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.8 Fugitive Dust Emissions [326 IAC 6-4]**

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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.9 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan to be submitted by the permittee to IDEM.

**C.10 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements**

**C.11 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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, OAM.

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

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

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

### **Compliance Monitoring Requirements**

#### **C.12 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.13 Monitoring Methods [326 IAC 3]**

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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, or other approved methods as specified in this permit.

#### **C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

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- (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. This compliance monitoring plan is comprised of:
- (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, OAM upon request and shall be subject to review and approval by IDEM, OAM. 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) Response steps that will 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 such 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, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. 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 or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned 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.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

C.16 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Annual Emission Statement [326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) 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.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Data Section, Office of Air Management  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### FACILITY DESCRIPTION

- (a) One (1) woodworking shop equipped with various wood cutting saws with a maximum capacity of one (1) floor per hour and vented to one (1) cyclone with baghouse dust collector and exhausting inside the building.
- (b) One (1) gypsum operation with various cutting saws with a maximum capacity of one (1) floor per hour and vented to another cyclone then to the same baghouse dust collector as the woodworking shop identified in A.2.(a).

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

### Emission Limitations and Standards

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking and gypsum operation shall not exceed 12.1 pounds per hour when operating at a process weight rate of 10,000 pounds per hour.

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

Interpolation and extrapolation 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.1.2 Preventive Maintenance Plan [326 IAC 1-1-6-3]

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

### Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.3 Testing Requirements [326 IAC 2-1. 1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.4 Particulate Matter (PM)

Pursuant to CP-039-4344-00307, issued on October 2, 1995, the cyclone and baghouse for PM control shall be in operation at all times when woodworking and gypsum and/or operations are being conducted.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3 (e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking and gypsum operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.1.6 Cyclone Inspections

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An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking and gypsum operations when venting to the atmosphere. An inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### D.1.7 Visible Emissions Notations

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- (a) Daily visible emission notations of the 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 the past 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 the specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.8 Broken or Failed Bag Detection for the Baghouse

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventative Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventative Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of the malfunction provisions of this permit (Section C - Malfunction Provisions).
- (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 a malfunction and the Permittee satisfies the requirements of the malfunction provisions of this permit (Section C - Malfunction Provisions).

#### D.1.9 Broken or Failure Detection for the Cyclone

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In the event that a cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of the malfunction provisions of this permit (Section C - Malfunction Provisions).

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.1.10 Record Keeping Requirements**

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- (a) To document compliance with condition D.1.5 and D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and D.1.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the cyclone and baghouse stack exhaust daily if the stacks are ever vented to the outside atmosphere.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records of any failed or broken units or bags of the cyclone and baghouse.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.2**

**EMISSIONS UNIT OPERATION CONDITIONS**

(c) Twenty-one (21) natural gas space heaters, heated at a total of 6.3 million British thermal units (MMBtu) per hour, exhausting at twenty-one (21) stacks, identified as Stacks 1 through 21.

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

**Emission Limitations and Standards**

There are no applicable emission limitations or standards for emission unit (c).

**SECTION D.3**

**EMISSIONS UNIT OPERATION CONDITIONS**

(d) facility is also using caulks, sealants, cleaners, and other miscellaneous VOC containing materials used to assemble manufactured homes for a maximum of one (1) floor per hour.

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

**Emissions Limitations and Standards**

There are no applicable emission limitations or standards for emission unit (d).

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Skyline Homes, Plant 812</b>
<b>Address:</b>	<b>1800 W. Hively Avenue</b>
<b>City:</b>	<b>Elkhart, Indiana 46515</b>
<b>Phone #:</b>	<b>219-552-8339</b>
<b>MSOP #:</b>	<b>039-12338-00307</b>

I hereby certify that Skyline Homes,  
Elkhart, Indiana is:                     still in operation.  
     no longer in operation.

I hereby certify that Skyline Homes,  
Elkhart, Indiana is:                     in compliance with the requirements of MSOP 039-12338-00307  
     not in compliance with the requirements of MSOP 039-12338-00307

<b>Authorized Individual (typed):</b>	
<b>Title:</b>	
<b>Signature:</b>	
<b>Date:</b>	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>	

## MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

PAGE 1 OF 2

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

### **326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

### **326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

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PAGE 2 OF 2

**Department of Environmental Management  
Office of Air Management**

Addendum to the  
Technical Support Document for a Minor Source Operating Permit

<b>Source Name:</b>	Skyline Homes, Plant 812
<b>Source Location:</b>	1800 W. Hively Avenue, Elkhart, Indiana
<b>County:</b>	Elkhart County
<b>SIC Code:</b>	2451
<b>Operation Permit No.:</b>	039-12338-00307
<b>Permit Reviewer:</b>	ERG/EG

On August 15, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Goshen, Indiana, stating that Skyline Homes, Plant 812 had applied for a Minor Source Operating Permit to operate a stationary source that produces manufactured homes. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

### **Responses to Skylines' Comments**

On October 11, 2000, Skyline submitted comments on the proposed Minor Source Operating Permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

#### C.9 Fugitive Dust Emissions [326 IAC 6-4]

Comment 1:

The source requested an exemption from the need to develop and submit a fugitive dust control plan (Condition C.9). The source has minimal opportunities for fugitive dust to be generated.

Response to Comment 1:

The draft permit did not specify the source to submit a fugitive dust control plan. The source is required to prevent visible fugitive dust from crossing the boundary or property line of the source. No change was made as a result of this comment.

Comment 2:

It is unclear why a semi-annual compliance monitoring report is required in Condition C.20(a). It is recommended that this condition be combined with C.21 and an annual report addressing both concerns be required. Thus eliminating an unclear requirement and streamline reporting requirements.

Response to Comment 2:

Typically, the semi-annual Compliance Monitoring Reports are only required for Part 70 and FESOP sources. However, there may be situations where reports will be required upon request from IDEM.

The condition will be revised as follows to account for the removal of the compliance monitoring report (deleted language in ~~strikeout~~, added language in **bold**).

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- ~~(a)~~ To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (a)(b)** The report required in ~~(a)~~ of this condition and **r**Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b)(c)** Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- ~~(d)~~ Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The semi-annual reporting period is from January 1 through June 30 and July 1 through December 31. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(e)~~ All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

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

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

~~(c)(g)~~ The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Comment 3:

If Condition C.20 is not combined with Condition C.21, the report required in Condition C.20 should be revised to specifically state the dates when the reports are due.

Response to Comment 3:

The report in Condition C.20 has been deleted from the permit. See response to comment 2 for the revised Condition C.20.

Comment 4:

Delete Condition D.1.7(a) and D.1.10 (b) requiring daily visible emission notations. Other recently issued permits for similar facilities do not have these conditions and this record keeping represents an unreasonable burden.

Response to Comment 4:

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. However, records are only required daily, not once per shift, for woodworking operations and only for emissions vented to the outside atmosphere. Condition D.1.10 will be changed as follows.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the cyclone and baghouse stack exhaust ~~once per shift~~ **daily if the stacks are ever vented to the outside atmosphere.**

Comment 5:

This facility has been in operation since 1963 and is not considered a new facility. As such, Condition D.3.1 and any reference to 326 IAC 8-1-6 should be deleted. It is unclear why the statement "as agreed to by the source" is included.

Response to Comment 5:

Proposed Section D.3.1, D.3.3, D.3.4, and D.3.5 will be deleted for there are no applicable requirements to emission units (d). These materials have been in use since the source began operation in 1978, before the applicability date of 326 IAC 8-1-6. With this permit, the source will increase the use of these materials but not adding any new application equipment (caulk, guns, brushes, etc.).

~~D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

~~Pursuant to 326 IAC 8-1-6, new facilities; general reduction requirements actual emissions of volatile organic (VOGs) compounds shall be limited to less than twenty-five (25) tons per year (tpy) per twelve (12) consecutive month period, rolled monthly, as agreed to by the source.~~

~~D.3.3 Testing Requirements [326 IAC 2-1. 1-11]~~

~~The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

~~D.3.4 VOC Emissions~~

~~Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of the each month based on the total volatile organic compound usage for the most recent twelve (12) month period.~~

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]**

~~D.3.5 Record Keeping Requirements~~

~~(a) The Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) 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 Condition D.3.1.~~

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

~~(b) To document compliance with Condition D.3.1, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.~~

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

Condition D.3.3 requirement should be deleted because this is not a new facility and 326 IAC 8-1-6 referred to in D.3.1 does not apply.

Response to Comment 6:

Condition D.3.3 was deleted, see response to comment 5 for more explanation.

Comment 7:

Condition D.3.4 requirement should be deleted because this is not a new facility and 326 IAC 8-1-6 referred to in D.3.1 does not apply. The facility maintains records on raw material usage to support VOC calculations should they become necessary. However, calculating monthly emissions on a routine basis is an extremely time consuming and burdensome activity.

Response to Comment 7:

Condition D.3.4 was deleted, see response to comment 5 for more explanation.

Comment 8:

As mentioned in earlier comments, the facility is not a new facility and all references to D.3.1 should be deleted. Condition D.3.5 should be revised to require maintenance of records to demonstrate the quantities of VOC containing materials used. Monthly VOC emission calculations should not be required, nor are they necessary to demonstrate compliance with permit or regulatory requirements, or for annual report or emission statement requirements.

Response to Comment 8:

Condition D.3.5 will be deleted for there are no applicable requirements to emission unit (d). See response to comment 5 for more explanation.

Comment 9:

Condition D.3.6 should be deleted. Please reference the above comments regarding semi-annual reporting and Condition D.3.1.

Response to Comment 9:

OAM agrees and Condition D.3.6 will be deleted.

#### D.3.6 Reporting Requirements

~~A summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period reported.~~

Comment 10:

It is unclear why a Preventive Maintenance Plan, Compliance Response Plan and Compliance Monitoring Plan are necessary when all provisions can be addressed in the Preventive Maintenance Plan. Having multiple plans serving no clear purpose makes it more difficult for sources to focus on activities that enhance and ensure compliance. This requirement does not enhance compliance, but provides opportunities for confusion and non-compliance. These plans are not mention anywhere in the regulations,

and IDEM has not responded to a request for guidance and clarification on the need for and content of these plans.

Response to Comment 10:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan."

After issuing the first draft permits on public notice with all the preventative maintenance requirements under PMP, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

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

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-1.1-11, 1-6-3 and 1-6-5.

For these reasons, IDEM considers the separation of the PMP and CRP to be important and no change was made.

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

- (1) Condition D.3.2 will be deleted because the requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:
  - (A) The unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
  - (B) The unit has existing applicable requirements; and
  - (C) The unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
  - (D) The unit has a control device and the allowable emissions exceed 10 pounds per hour; or;
  - (E) The unit does not have a control device and has actual emissions exceeding 25 tons per year.

In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above.

The emission unit in Section D.3 does not meet the guidance stated above, therefore, the preventive maintenance plan is not required. The condition will be deleted from Section D.3 and in the Table of Contents.

## **Indiana Department of Environmental Management (IDEM) Office of Air Management**

### **Technical Support Document (TSD) for a Minor Source Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Skyline Homes, Plant 812</b>
<b>Source Location:</b>	<b>1800 W. Hively Avenue</b>
<b>County:</b>	<b>Elkhart</b>
<b>Construction Permit No.:</b>	<b>039-12338-00307</b>
<b>SIC Code:</b>	<b>2451</b>
<b>Permit Reviewer:</b>	<b>ERG/EG</b>

The Office of Air Management (OAM) has reviewed the permit renewal application from Skyline Home relating to the proposed modifications and the existing operations of a manufactured home production.

#### **Source Definition**

This manufactured homes company consists of four (4) plants:

- (a) Plant 112 is located at U.S. Highway 33 South, Goshen, Indiana.
- (b) Plant 111 is located at State Road #15, Bristol, Indiana.
- (c) Plant 812 is located at 1800 West Hively Avenue, Elkhart, Indiana.
- (d) Plant 616 is located at 401 County Road 15 South, Elkhart, Indiana.

These four (4) plants are not located in contiguous properties, but have the same SIC codes except for Plant 616 and are owned by one (1) company, they will be considered four (4) separate sources. Each source produces their own product and production materials are not shared between facilities.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) woodworking shop equipped with various wood cutting saws with one (1) cyclone with baghouse dust collector and exhausting inside the building.
- (b) One (1) gypsum operation with various cutting saws vented to another cyclone then to the same baghouse dust collector as the woodworking shop identified in (a).
- (c) Twenty-one (21) natural gas space heaters, heated at a total of 6.3 million British thermal units (MMBtu) per hour, exhausting at twenty-one (21) stacks, identified as Stacks 1 through 21.

- (d) Facility is also using caulks, sealants, cleaners, and other miscellaneous VOC containing materials used to assemble manufactured homes.

### Proposed Emission Units

The source consists of the following proposed modifications:

- (a) The permitted emissions units a, b, and d will increase their maximum capacity to one (1.0) floor per hour (approximately 10,000 lbs per hour).

### Existing Approvals

All conditions from previous approvals were incorporated into this permit except the following from CP-039-4344-00307, issued on October 2, 1995:

- (a) Condition 5: that the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:
  - (1) Visibly detectable at the exhaust, or
  - (2) Accumulated on the rooftops or on the ground.
- (b) Reason not incorporated: the source no longer spray applies any surface coatings or solvents.
- (c) Condition 6: That pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions due to woodworking activities shall be limited to 8.38 pounds per hour.
- (d) Reason not incorporated: The source will increase process weight rate from 5,814 hour to 10,000 pounds per hour.

All conditions from previous approvals were incorporated into this permit from CP-039-4955-00307, issued on November 29, 1995.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
39	Cyclone/Baghouse	10 above ground	1.3x4	5500	ambient
1-21	Gas Space Heaters	16-25 above ground	0.5	400 each	300

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

- (a) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
- (b) An application for the purposes of this review was received on June 1, 2000.

### Emissions Calculations

See Appendix A of this document for detailed emissions calculations (pages 1-8). An EPA approved report by the Society of the Plastics Industry's Polymethanes Division found the MDI is used up in the reaction during the application of the product, thus, no emissions of methylene diphenyl diisocyanate (MDI) are reported in the emission calculations.

### 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 or emissions unit 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, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	197.3
PM-10	41.8
SO <sub>2</sub>	0.02
VOC	45.2
CO	2.3
NO <sub>x</sub>	2.8

HAP's	Potential To Emit (tons/year)
Xylene	0.8
Toluene	1.01
Methyl Ethyl Ketone	2.5
Hexane	1.5
Ethylene Glycol	1.5
Other HAPs	0.05
TOTAL	6.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each criteria pollutant is less than one hundred (100) tons per year (PM-10 is the criteria pollutant considered under 326 IAC 2-7 not PM). Therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-6-1) of all criteria pollutants are more than ten (10) tons per year and located in Elkhart County. Therefore, the source is subject to the provisions of 326 IAC 2-6. The source was already a MSOP before the renewal application and with the modifications the source is still a MSOP.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	0
VOC	7

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Woodworking and Gypsum	0.20	0.04					
Natural Gas Fired Space Heaters	0.21	0.21	0.02	0.15	2.32	2.76	0.052
Miscellaneous Product Materials				45.02			7.3
<b>Total Emissions</b>	<b>0.41</b>	<b>0.25</b>	<b>0.02</b>	<b>45.17</b>	<b>2.32</b>	<b>2.76</b>	<b>7.35</b>

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment

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

**Source Status**

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

Pollutant	Emissions (ton/yr)
PM	0.33
PM10	0.23
SO <sub>2</sub>	0.02
VOC	27.01
CO	2.32
NO <sub>x</sub>	2.76

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

**Proposed Modification**

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

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	0.08	0.02	0	18.01	0	0
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

This proposed modification could have been reviewed as a minor permit revision to a MSOP, but the renewal of their operating permit and the proposed modifications from this current application were done together in this MSOP.

### **Part 70 Permit Determination**

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including emissions from the proposed modifications, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

### **Federal Rule Applicability**

#### 40 CFR Part 63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations)

This source is not subject to 40 CFR Part 63 Subpart JJ because this source does not manufacture wood furniture or wood furniture components as defined by Subpart JJ.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 14 and 40 CFR Part 63) applicable to this source.

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

### **State Rule Applicability - Entire Source**

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

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

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

**326 IAC 6-4 (Fugitive Dust Emissions)**

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

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

Pursuant to this rule, the permittee shall control PM emissions at the source according to the control plan required in 326 IAC 6-5-3, to be submitted by the permittee to IDEM.

**State Rule Applicability - Individual Facilities**

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

Pursuant to CP 039-4344-00307, issued on October 2, 1995, the particulate matter (PM) from the coating spray guns, gypsum and woodworking operations shall be limited by the following:

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

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

The cyclone and baghouse dust collector shall be in operation at all times the gypsum and woodworking operations in order to comply with this limit.

**326 IAC 2-4.1 (Major Sources of Hazardous Pollutants)**

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

- (a) A single hazardous pollutant (HAP) is less than 10 tons per year, and
- (b) Any combination of HAPs is less than 25 tons per year.

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

Although this source is constructing a new facility which will have a potential to emit volatile organic compounds greater than twenty-five (25) tons per year (tpy), the source has agreed to limit the actual VOC emissions to less than 25 tpy per twelve (12) consecutive month period, rolled monthly. Therefore, rule 8-1-6 does not apply.

**326 IAC 8-11-3 (Wood Furniture Coating)**

This source is not subject to the requirements of 326 IAC 8-11-3 because this source only applies surface coating to interior wood and gypsum walls of manufactured homes and not to wood furniture.

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

This source is not subject to the requirements of 326 IAC 8-2-12 because this rule applies to cabinet wood parts of the product. There are no coatings applied to cabinets, as the cabinets come pre stained or vinyl wrapped. The rest of the wood in the product that receives coatings is structural wood and not subject to this rule.

**Conclusion**

The operation of this manufactured home plant shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-12338-00307.

				**see below		
	ERR	ERR	ERR	ERR	ERR	ERR

combined filterable and condensable PM and PM10, respectively.

trolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

ormal firing.

as

at Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

hapter 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

MCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

id test methods for PM and PM10 when using the above emission factors to confirm that the  
ible included/not included).

culations.

12338cal.wk4  
updated 8/00



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

Company Name: Skyline  
Address City IN Zip: Elkhart 46515  
CP: 039-12338-00307  
Pft ID: 307  
Reviewer: ERG/EG

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

Company Name: Skyline  
Address City IN Zip: Elkhart 46515  
CP: 039-12338-00307  
Pft ID: 307  
Reviewer: ERG/EG  
Date: 08/7/00

**Table 1: Potential to Emit at Proposed Maximum Production Level**

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
Oatey flowguard	7.59	80.00%	0.0%	80.0%	0.0%	0.00%	0.04090	1.000	6.07	6.07	0.25	5.96	1.09	0.00	0.00	100%
Oatey ABS Cement	7.09	78.00%	0.0%	78.0%	0.0%	0.00%	0.00920	1.000	5.53	5.53	0.05	1.22	0.22	0.00	25.13	100%
Enerfoam	10.01	0.00%	0.0%	0.0%	0.0%	100.00%	0.23000	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Foamseal F2100A	10.25	0.00%	0.0%	0.0%	0.0%	100.00%	3.41500	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Foamseal F2100B	8.67	1.80%	0.0%	1.8%	2.6%	97.40%	3.55700	1.000	0.16	0.16	0.56	13.32	2.43	0.00	0.16	100%
Pemco 5100 Adhesive	9.34	0.00%	0.0%	0.0%	0.0%	100.00%	1.70000	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Sun 59-10 Adhesive	9.10	60.00%	60.0%	0.0%	60.0%	40.00%	2.28900	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Enerfoam Cleaner	7.99	100.00%	4.2%	95.8%	4.2%	0.00%	0.03900	1.000	7.99	7.65	0.30	7.16	1.31	0.00	0.00	100%
Foamseal GC33	8.20	100.00%	0.0%	100.0%	0.0%	0.00%	0.01340	1.000	8.20	8.20	0.11	2.64	0.48	0.00	0.00	100%
Pemco 1983	7.92	100.00%	0.0%	100.0%	0.0%	0.00%	0.02020	1.000	7.92	7.92	0.16	3.84	0.70	0.00	0.00	100%
Old English	6.67	100.00%	100.0%	0.0%	100.0%	0.00%	0.00200	1.000	ERR	0.00	0.00	0.00	0.00	0.00	0.00	100%
Bostik 900	10.09	6.20%	0.0%	6.2%	0.0%	93.80%	0.00330	1.000	0.63	0.63	0.00	0.05	0.01	0.00	0.67	100%
Brewer Roof Cement	9.40	18.40%	0.0%	18.4%	0.0%	81.60%	2.91500	1.000	1.73	1.73	5.04	121.00	22.08	0.00	2.12	100%
Colorimetric Silicone	8.59	6.03%	0.0%	6.0%	0.0%	93.98%	0.01040	1.000	0.52	0.52	0.01	0.13	0.02	0.00	0.55	100%
OSI 160 Caulk	13.47	15.00%	13.5%	1.5%	13.5%	85.00%	0.60030	1.000	0.24	0.21	0.12	2.97	0.54	0.00	0.24	100%
OSI 167 Caulk	12.98	30.00%	27.4%	2.6%	27.4%	70.00%	0.13440	1.000	0.47	0.34	0.05	1.10	0.20	0.00	0.49	100%
Rectorseal Pipe Dope	11.43	23.00%	0.0%	23.0%	0.0%	77.00%	0.01650	1.000	2.63	2.63	0.04	1.04	0.19	0.00	3.41	100%
Sun 41 Sealer	8.76	0.00%	0.0%	0.0%	0.0%	100.00%	0.12440	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Sun 4512 Vapor Barrier	9.59	100.00%	99.3%	0.7%	99.3%	0.00%	3.144000	1.00	9.59	0.07	0.21	5.07	0.92	0.00	0.00	60%
Color Putty	8.34	0.00%	0.0%	0.0%	0.0%	100.00%	0.12800	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
DAP Wood Dough	9.92	28.00%	0.0%	28.0%	0.0%	75.00%	0.00400	1.000	2.78	2.78	0.01	0.27	0.05	0.00	3.70	100%
Leak Detector	8.67	100.00%	55.5%	44.5%	55.0%	0.00%	0.01080	1.000	8.57	3.86	0.04	1.00	0.18	0.00	0.00	100%
DAP Spray Paint	6.67	57.50%	0.0%	57.5%	0.0%	40.10%	0.00540	1.000	3.84	3.84	0.02	0.50	0.09	0.00	9.56	100%
Geocel 2000	8.17	34.15%	0.0%	34.1%	0.0%	65.85%	0.02770	1.000	2.79	2.79	0.08	1.85	0.34	0.00	4.24	100%
Cycle C-111	6.34	100.00%	26.0%	74.0%	26.0%	0.00%	0.02270	1.000	6.34	4.69	0.11	2.56	0.47	0.00	0.00	100%
TACC MH2400	11.42	32.00%	23.8%	8.2%	23.2%	96.80%	0.27970	1.000	1.22	0.94	0.26	6.29	1.15	0.00	0.97	100%
Oatey PVC Cement	7.51	88.00%	0.0%	88.0%	0.0%	7.50%	0.00150	1.000	6.61	6.61	0.01	0.24	0.04	0.00	88.12	100%
Oatey Cleaner	6.61	100.00%	10.0%	90.0%	10.0%	0.00%	0.00020	1.000	6.61	5.95	0.00	0.03	0.01	0.00	0.00	100%
Franklin 50667	9.21	33.80%	32.5%	1.3%	32.4%	66.20%	0.14460	1.000	0.18	0.12	0.02	0.42	0.08	0.00	0.18	100%
Beaver Insta Shine	8.17	77.60%	60.0%	17.6%	60.0%	5.16%	0.08060	1.000	3.60	1.44	0.12	2.78	0.51	0.00	27.88	100%
Lukweld 800	6.41	87.70%	26.5%	61.2%	26.5%	12.30%	0.14550	1.000	5.34	3.92	0.57	13.70	2.50	0.00	31.89	100%
IPS 773	7.23	69.00%	0.0%	69.0%	0.0%	0.9820%	0.09820	1.000	4.99	4.99	0.49	11.76	2.15	0.00	14.25	100%
Sprayway 841	8.34	100.00%	62.5%	37.5%	62.5%	0.00%	0.00500	1.000	8.34	3.13	0.02	0.38	0.07	0.00	0.00	100%
Sprayway 862	8.34	100.00%	85.0%	15.0%	85.0%	0.00%	0.02650	1.000	8.34	1.25	0.03	0.80	0.15	0.00	0.00	100%
Bart 363	5.70	82.50%	0.0%	82.5%	0.0%	17.70%	0.07290	1.000	4.70	4.70	0.34	8.23	1.50	0.00	26.57	100%
Camie 22/90	5.90	100.00%	0.0%	100.0%	0.0%	0.30%	0.07060	1.000	5.90	5.90	0.42	10.00	1.82	0.00	1966.67	100%
Champion Glass Cleaner	8.34	100.00%	92.0%	8.0%	92.0%	0.00%	0.03230	1.000	8.34	0.67	0.02	0.52	0.09	0.00	0.00	100%
Beaver Bea-Tween	8.21	100.00%	50.0%	50.0%	50.0%	0.00%	0.00110	1.000	8.21	4.11	0.00	0.11	0.02	0.00	0.00	100%
Beaver Teep-a-Klean	7.01	93.00%	0.0%	93.0%	0.0%	0.00%	0.08070	1.000	6.52	6.52	0.53	12.63	2.30	0.00	0.00	100%
Harvey Seal	11.34	28.00%	0.0%	28.0%	0.0%	72.00%	0.01410	1.000	3.18	3.18	0.04	1.07	0.20	0.00	4.41	100%
OSI SC-175	13.23	22.30%	20.9%	1.4%	20.9%	77.70%	0.40800	1.000	0.23	0.18	0.07	1.76	0.32	0.00	0.23	100%
DAP Spray Paint	6.26	59.90%	0.0%	59.9%	0.0%	40.10%	0.04770	1.000	3.75	3.75	0.18	4.29	0.78	0.00	9.35	100%

State Potential Emissions

10.28

246.66

45.02

0.00

