

April 1, 2002

Mr. John Guequierre
Indiana Building Systems, LLC
51700 Lovejoy Drive
Middlebury, Indiana 46540

Re: 039-15372-00489
Second Administrative Amendment to
FESOP F039-9757-00489

Dear Mr. Guequierre:

Indiana Building Systems, LLC was issued a FESOP permit on July 21, 2000 for a stationary mobile home manufacturing source. A letter requesting a change in descriptive language in Section A.2 and D.1 was received on March 13, 2002. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following independent and parallel facilities, collectively known as EU-1:

- (a) One (1) ~~single wide construction~~ **factory built housing** facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.
- (b) One (1) ~~double wide construction~~ **factory built housing** facility, known as Plant 2, installed in 1997, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Independent and parallel facilities, collectively known as EU-1:

- (a) One (1) ~~single wide construction~~ **factory built housing** facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.
- (b) One (1) ~~double wide construction~~ **factory built housing** facility, known as Plant 2, installed in 1997, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

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

The information identified is descriptive only and does not change the unit rate or independent and parallel facilities, collectively known as EU-1. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gary Freeman, at (800) 451-6027, press 0 and ask for Gary Freeman or extension (3-5334), or dial (317) 233-5334.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments: Updated Pages

PD/gkf

cc: File -Elkhart County
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section -Karen Nowak
IDEM Northern Regional Office
Permit Review Section 1 - Gary Freeman

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Indiana Building Systems, LLC
51700 Lovejoy Drive
Middlebury, Indiana 46540**

(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 2-8 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.: F 039-9757-00489	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 21, 2000 Expiration Date: July 21, 2005

First Administrative Amendment 039-13770-00489, issued January 29, 2001
First Reopening 039-13032-00489, issued September 24, 2001

Second Administrative Amendment: 039-15372-00489	Pages Affected: 4 and 25
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 1, 2002

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.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 2-8-3(b)]

The Permittee owns and operates a stationary mobile home manufacturing source.

Authorized individual: John Guequierre
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Phone Number: 219 - 825 - 3700
SIC Code: 3710
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following independent and parallel facilities, collectively known as EU-1:

- (a) One (1) factory built housing facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.
- (b) One (1) factory built housing facility, known as Plant 2, installed in 1997, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes 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 million (10,000,000) British thermal units per hour.
- (b) Water-based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Independent and parallel facilities, collectively known as EU-1:

- (a) One (1) factory built housing facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.
- (b) One (1) factory built housing facility, known as Plant 2, installed in 1997, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

(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 2-8-4(1)]

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

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the surface coating operations was determined to be material substitution which limits the potential VOC delivered to the applicators to 218.7 tons per twelve (12) consecutive month period from Plants 1 and 2, known as EU-1. The maximum VOC content of any coating shall be 7.16 pounds of VOC per gallon of coating less water. The following management and work practices shall apply:

- (a) Operator training course.
- (b) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
- (c) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.
- (d) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.
- (e) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (f) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spillage on the floor.

- (g) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.