



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 17, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Creation Windows, Inc. / 039-15413-00230

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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NEW SOURCE REVIEW PERMIT AND FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Creation Windows, Inc.
53061 Ada Drive
Elkhart, Indiana 46515**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 039-15413-00230	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:



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Emergency Occurrence Form
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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.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 production facility that produces windows for installation on RV's, homes and commercial trucks.

Authorized individual:	Edward Wogoman, Human Resources Administrator
Source Address:	53061 Ada Drive, Elkhart, Indiana 46515
Mailing Address:	P.O. Box 1409, Elkhart, Indiana 46515
SIC Code:	3231
General Source Phone:	574-264-3131
County Location Status:	Elkhart
Source Location 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 Not 1 of 28 Source Categories

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

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

- (a) Plant #1, with a production capacity of 960 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #1 was constructed in January of 1978. Plant #1 uses 711.3 gallons/year of mineral spirits, 455.2 gallons/year of Uniroyal Silaprene, 1142.4 gallons/year of Isopropyl Alcohol, 5130.1 gallons/year of 7030 Dolchem BLK, 17.7 gallons/year of Permetex, 1034.6 gallons/year of 7031 Clear Sealant, 879.9 gallons/year of Aktivator, 33.2 gallons/year of 3M UVAHH Promoter, 10993.1 gallons/year of Sika Polyurethane, 172.4 gallons/year of Citra Solve and 409.5 gallons/year of Safety Kleen. Plant #1 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (b) Plant #2, with a production capacity of 280.4 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #2 was constructed in January of 1984. Plant #2 uses 151 gallons/year of Citra Solve, 3,988 gallons/year of Schneemorhead 5555, and 1,293 gallons/year of Schneemorhead 5504. Plant #2 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (c) Plant #3, with a production capacity of 875 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #3 was constructed in July of 1987. Plant #3 uses 410 gallons/year of Isopropyl Alcohol, 18 gallons/year of Permetex, 212 gallons/year of Aktivator, 13580 gallons/year of Sika Polyurethane, 243 gallons/year of Sikaflex 221

Polysealant, 52 gallons/year of Safety Kleen, 1 gallon/year of P-80 Emulsion Lubricant, and 4009 gallons/year of Dolphin 7045 BLK Sealant. Plant #3 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.

- (d) Plant #4, with a production capacity of 3,575 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant # 4 uses 215.6 gallons/year of Buckeye Best Yet, 353.5 gallons/year of Uniroyal Silaprene, 51.7 gallons/year of Isopropyl Alcohol, 49.6 gallons/year of Sika Polyurethane, 107.8 gallons/year of Safety Kleen, 237.1 gallons/year of Hydraulic Oil Citgo, 431.1 gallons/year of Mer-lube Oil, 4,699 gallons/year of Tru-Seal, 11898.4 gallons/year of Dolphin Back Bedding, 1573.5 gallons/year of Dolphin Black Caulk, 301.8 gallons/year of Dolphin Silver Caulk, 1164.0 gallons/year of Dolphin White Caulk, 103.5 gallons/year of glass Supplies Cutting Fluid, and 646.7 gallons/year of Spartan Orange Drain Cleaner. Plant #4 uses a baghouse to control particulate matter from the saws, presses, and grooving machines. This equipment was installed in 2002.

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):

Natural gas-fired space heaters with a total heat input equal to 2.385 million Btu per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, 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.4 Enforceability [326 IAC 2-8-6]

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.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 April 15 of each year to:

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

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) 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 extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes 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, and the Northern Regional Office, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Northern Regional Office
Telephone No. 1-800-753-5519 or 574-245-4870
Fax: 574-245-4877

- (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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 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 material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)].
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(2) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC-13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 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) 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.

C.5 Incineration [326 IAC 4-1] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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 units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

- (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 notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 14-10-1 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) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use in Indiana Accredited Asbestos inspector be accredited in not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 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 by issuing an order under 326 IAC 2-1.1-11. 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) 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 thirty (30) 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 thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

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(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(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 response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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.17 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, 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 quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.18 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 2-8-4(10)]:

- (a) Plant #1, with a production capacity of 960 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #1 was constructed in January of 1978. Plant #1 uses 711.3 gallons/year of mineral spirits, 455.2 gallons/year of Uniroyal Silaprene, 1142.4 gallons/year of Isopropyl Alcohol, 5130.1 gallons/year of 7030 Dolchem BLK, 17.7 gallons/year of Permetex, 1034.6 gallons/year of 7031 Clear Sealant, 879.9 gallons/year of Aktivator, 33.2 gallons/year of 3M UVAHH Promoter, 10993.1 gallons/year of Sika Polyurethane, 172.4 gallons/year of Citra Solve and 409.5 gallons/year of Safety Kleen. Plant #1 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (b) Plant #2, with a production capacity of 280.4 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #2 was constructed in January of 1984. Plant #2 uses 151 gallons/year of Citra Solve, 3,988 gallons/year of Schneemorhead 5555, and 1,293 gallons/year of Schneemorhead 5504. Plant #2 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (c) Plant #3, with a production capacity of 875 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #3 was constructed in July of 1987. Plant #3 uses 410 gallons/year of Isopropyl Alcohol, 18 gallons/year of Permetex, 212 gallons/year of Aktivator, 13580 gallons/year of Sika Polyurethane, 243 gallons/year of Sikaflex 221 Polysealant, 52 gallons/year of Safety Kleen, 1 gallon/year of P-80 Emulsion Lubricant, and 4009 gallons/year of Dolphin 7045 BLK Sealant. Plant #3 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (d) Plant #4, with a production capacity of 3,575 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant # 4 uses 215.6 gallons/year of Buckeye Best Yet, 353.5 gallons/year of Uniroyal Silaprene, 51.7 gallons/year of Isopropyl Alcohol, 49.6 gallons/year of Sika Polyurethane, 107.8 gallons/year of Safety Kleen, 237.1 gallons/year of Hydraulic Oil Citgo, 431.1 gallons/year of Mer-lube Oil, 4,699 gallons/year of Tru-Seal, 11898.4 gallons/year of Dolphin Back Bedding, 1573.5 gallons/year of Dolphin Black Caulk, 301.8 gallons/year of Dolphin Silver Caulk, 1164.0 gallons/year of Dolphin White Caulk, 103.5 gallons/year of glass Supplies Cutting Fluid, and 646.7 gallons/year of Spartan Orange Drain Cleaner. Plant #4 uses a baghouse to control particulate matter from the saws, presses, and grooving machines. This equipment was installed in 2002.

(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 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3:

- (a) The allowable particulate emission rate from the Plant 1 aluminum sawing operations shall not exceed 2.5 pounds per hour when operating at a process weight rate of 960 pounds per hour.
- (b) The allowable particulate emission rate from the Plant 2 aluminum sawing operations shall not exceed 1.1 pounds per hour when operating at a process weight rate of 280.4 pounds per hour.
- (c) The allowable particulate emission rate from the Plant 3 aluminum sawing operations shall not exceed 2.4 pounds per hour when operating at a process weight rate of 875 pounds per hour.
- (d) The allowable particulate emission rate from the Plant 4 aluminum sawing operations shall not exceed 6.1 pounds per hour when operating at a process weight rate 3,575 pounds per hour.

The pounds per hour limitations were calculated using 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.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than 25 tons per twelve consecutive month period. Compliance with this condition limits HAP emissions from the entire source to less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs. Therefore, 326 IAC 2-7 does not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Hazardous Air Pollutant (HAP) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total HAP usage for the month. Compliance shall be determined using formulation data supplied by the coating manufacturer.

D.1.5 Particulate Control

In order to comply with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the plants at all times that the plants are in operation.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total HAP usage for each month; and
 - (4) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Creation Windows, Inc.
Source Address: 53061 Ada Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1409, Elkhart, Indiana 46515
FESOP No.: F039-15413-00230

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 Affidavit (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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Creation Windows, Inc.
Source Address: 53061 Ada Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1409, Elkhart, Indiana 46515
FESOP No.: F039-15413-00230

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe 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
CThe Permittee must submit notice in writing or by facsimile within two (2) working 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, PM10, 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**

FESOP Quarterly Report

Source Name: Creation Windows, Inc.
Source Address: 53061 Ada Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1409, Elkhart, Indiana 46515
FESOP No.: F039-15413-00230
Facility: Plant 1, 2, 3, and 4
Parameter: HAPs
Limit: The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than 10 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**

FESOP Quarterly Report

Source Name: Creation Windows, Inc.
Source Address: 53061 Ada Drive, Elkhart, Indiana 46515
Mailing Address: P.O. Box 1409, Elkhart, Indiana 46515
FESOP No.: F039-15413-00230
Facility: Plant 1, 2, 3, and 4
Parameter: HAPs
Limit: The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be limited to less than 25 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Creation Windows, Inc.
 Source Address: 53061 Ada Drive, Elkhart, Indiana 46515
 Mailing Address: P.O. Box 1409, Elkhart, Indiana 46515
 FESOP No.: F039-15413-00230

Months: _____ **to** _____ **Year:** _____

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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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 Federally Enforceable State Operating Permit (FESOP)

Source Name: Creation Windows, Inc.
 Source Location: 53061 Ada Drive, Elkhart, Indiana 46515
 County: Elkhart
 SIC Code: 3231
 Operation Permit No.: F039-15413-00230
 Permit Reviewer: ERG/ARB

On September 9, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana stating that Creation Windows, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of a plant producing windows for installation in RV's, mobile homes, and commercial trucks. The notice also stated that OAQ 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.

Upon further review, the OAQ 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, if applicable, to reflect these changes.

1. OAQ has moved the provision that is required by 326 IAC 2-8-4(5) from B.10 to the front cover page of the permit.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

- ~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~
- ~~(1) Enforcement action;~~
 - ~~(2) Permit termination, revocation and reissuance, or modification; and~~
 - ~~(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 Section B, Emergency Provisions.~~

NEW SOURCE REVIEW PERMIT AND FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Creation Windows, Inc.
53061 Ada Drive
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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 039-15413-00230	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Creation Windows, Inc.
Source Location: 53061 Ada Drive, Elkhart, Indiana 46515
County: Elkhart
SIC Code: 3231
Operation Permit No.: F039-15413-00230
Permit Reviewer: ERG/ARB

The Office of Air Quality (OAQ) has reviewed a FESOP application from Creation Windows, Inc. relating to the operation of a plant producing windows for installation in RV's, mobile homes, and commercial trucks.

History

Creation Windows, Inc. previously operated two plants in Elkhart, Indiana. One plant is located at 53061 Ada Drive and operates under Registration 039-3850-00230. The other plant was located at 1130 Herman Street and operated under Registration 039-4394-00315. The Herman Street plant has been closed and all of the equipment located at 1130 Herman Street, Elkhart, Indiana was moved to the plant located at 53061 Ada Drive. The combination of all of the equipment results in a potential to emit hazardous air pollutants (HAPs) that is greater than the Title V thresholds. However, the source has agreed to voluntarily limit the HAP emissions to less than the Title V thresholds.

Source Definition

Creation Windows, Inc. operated two (2) plants in Elkhart, Indiana:

- (a) Plant 1 is located at 53061 Ada Drive, Elkhart, Indiana 46515; and
- (b) Plant 2 was located at 1130 Herman Street, Elkhart, Indiana 46516 and is now closed. All the equipment that was located at Plant 2 has been moved to Plant 1.

This permit is for Plant 1, located at 53061 Ada Drive. Although both plants were owned and operated by the same company and operated under the same SIC code, the plants were located five miles apart and did not share the same employees or the same materials. Based on this information, IDEM, OAQ previously determined that the plants should not be considered as one source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Plant #1, with a production capacity of 960 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #1 was constructed in January of 1978. Plant #1 uses 711.3 gallons/year of mineral spirits, 455.2 gallons/year of Uniroyal Silaprene, 1142.4 gallons/year of Isopropyl Alcohol, 5130.1 gallons/year of 7030 Dolchem BLK, 17.7 gallons/year of Permetex, 1034.6 gallons/year of 7031 Clear Sealant, 879.9 gallons/year of Aktivator, 33.2 gallons/year of 3M UVAHH Promoter, 10993.1 gallons/year of Sika Polyurethane, 172.4 gallons/year of Citra Solve and 409.5 gallons/year of Safety Kleen. Plant #1 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (b) Plant #2, with a production capacity of 280.4 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #2 was constructed in January of 1984. Plant #2 uses 151 gallons/year of Citra Solve, 3,988 gallons/year of Schneemorhead 5555, and 1,293 gallons/year of Schneemorhead 5504. Plant #2 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.
- (c) Plant #3, with a production capacity of 875 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant #3 was constructed in July of 1987. Plant #3 uses 410 gallons/year of Isopropyl Alcohol, 18 gallons/year of Permetex, 212 gallons/year of Aktivator, 13580 gallons/year of Sika Polyurethane, 243 gallons/year of Sikaflex 221 Polysealant, 52 gallons/year of Safety Kleen, 1 gallon/year of P-80 Emulsion Lubricant, and 4009 gallons/year of Dolphin 7045 BLK Sealant. Plant #3 uses a baghouse to control particulate matter from the saws, presses, and grooving machines.

Unpermitted Emission Units and Pollution Control Equipment

- (d) Plant #4, with a production capacity of 3,575 pounds of assembled windows per hour which consists of a window assembly booth for application of adhesives and sealants, a pane preparation booth for glass cleaning, bandsaws, miter saws, chop saws, drill presses, punch presses, double head saws, weep-hole grooving machines, and other assorted production equipment. Plant # 4 uses 215.6 gallons/year of Buckeye Best Yet, 353.5 gallons/year of Uniroyal Silaprene, 51.7 gallons/year of Isopropyl Alcohol, 49.6 gallons/year of Sika Polyurethane, 107.8 gallons/year of Safety Kleen, 237.1 gallons/year of Hydraulic Oil Citgo, 431.1 gallons/year of Mer-lube Oil, 4,699 gallons/year of Tru-Seal, 11898.4 gallons/year of Dolphin Back Bedding, 1573.5 gallons/year of Dolphin Black Caulk, 301.8 gallons/year of Dolphin Silver Caulk, 1164.0 gallons/year of Dolphin White Caulk, 103.5 gallons/year of Glass Supplies Cutting Fluid, and 646.7 gallons/year of Spartan Orange Drain Cleaner. Plant #4 uses a baghouse to control particulate matter from the saws, presses, and grooving machines. This equipment was installed in 2002.

New Emission Units and Pollution Control Equipment

There are no new emission units proposed for this combined source.

Insignificant Activities

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

Natural gas-fired space heaters with a total heat input equal to 2.385 million Btu per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Registration 039-3850-00230, issued on October 6, 1994.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

- (a) IDEM is aware that equipment has been installed at this plant 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) IDEM is aware that the source failed to submit a timely Title V permit application prior to December 14, 1996.
- (c) IDEM is reviewing these matters 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 FESOP 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.

An administratively complete FESOP application for the purposes of this review was received on January 11, 2002. Additional information was received on August 20, 2002 makes the FESOP application administratively complete.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

Potential To Emit for the Source

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	33.0
PM-10	33.0
SO ₂	0.01
VOC	62.0

Pollutant	Potential To Emit (tons/year)
CO	0.88
NOx	1.04

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)
Xylene	0.1
Toluene	35.3
Methyl Ethyl Ketone	1.3
TOTAL	36.7

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater 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 greater than or equal to twenty-five(25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (c) 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.

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 Federally Enforceable State Operating Permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Plants 1, 2, 3, & 4	32.95	32.95	-----	61.98	-----	-----	Less than 10 tpy for any single HAP and less than 25 tpy for any combination of HAPs
Space Heaters	0.02	0.08	0.01	0.06	0.88	1.04	
Total Emissions	32.97	33.03	0.01	62.04	0.88	1.04	Less than 10 tpy for any single HAP and less than 25 tpy for any combination of HAPs

“---“ = negligible emissions.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance or unclassifiable for ozone.
- (b) Elkhart 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.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)), because this source does not surface coat automobiles or light duty trucks. This source produces windows for installation in RV's, mobile homes, and commercial trucks.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart CC (Glass Manufacturing Plants)), because this source does not manufacture glass. This source uses glass to produce windows for use in RV's, mobile, homes, and commercial trucks.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) 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 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 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 (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 2-2 (Prevention of Significant Deterioration (PSD))

This source is not 1 of 28 source categories defined in 326 IAC 2-2-1(y)(1) and the potential to emit of any regulated pollutant for the entire source is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

The operation of this window production facility is limited to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)

The potential HAP emissions from the entire source are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. Pursuant to 326 IAC 2-8-4, the amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than 25 tons per twelve consecutive month period. Compliance with this condition limits HAP emissions from the entire source to less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs. Therefore, 326 IAC 2-7 does not apply.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Particulate Emissions Limitation for Manufacturing Processes)

Pursuant to 326 IAC 6-3,

- (a) The allowable particulate emission rate from the Plant 1 aluminum sawing operations shall not exceed 2.5 pounds per hour when operating at a process weight rate of 960 pounds per hour.
- (b) The allowable particulate emission rate from the Plant 2 aluminum sawing operations shall not exceed 1.1 pounds per hour when operating at a process weight rate of 280.4 pounds per hour.
- (c) The allowable particulate emission rate from the Plant 3 aluminum sawing operations shall not exceed 2.4 pounds per hour when operating at a process weight rate of 875 pounds per hour.
- (d) The allowable particulate emission rate from the Plant 4 aluminum sawing operations shall not exceed 6.1 pounds per hour when operating at a process weight rate 3,575 pounds per hour.

The pounds per hour limitations were calculated using 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:

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

The baghouses shall be in operation at all times the plants are in operation, in order to comply with these limits.

40 CFR 52, Subpart P (Particulate Emission Limitations)

The window assembly booths and the pane preparation booths used for surface coating operations are not subject to this rule because no particulate emissions are produced. The surface coatings are applied using brushes.

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

The window assembly booths and the pane preparation booths each have potential VOC emissions that are less than 25 tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

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

This source operates under Standard Industrial Classification (SIC) Code 3231, which is not one of the industrial categories subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

Testing Requirements

Testing is not required for this source because the emissions of hazardous air pollutants will be verified through monthly records of the amount and HAP content of surface coatings and clean-up solvents used.

Compliance Requirements

Permits issued under 326 IAC 2-8 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, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. 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.

Compliance monitoring is not required for the baghouses because the pound per hour allowable particulate matter emissions are very low and the particulate matter emissions after controls are well below the allowables.

Conclusion

This operation of producing windows for installation in RV's, mobile homes, and commercial trucks shall be subject to the conditions of the attached proposed FESOP No.: F039-15413-00230.

Appendix A: Emissions Calculations
Aluminum Sawing Emissions From All Four Plants
Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Plt ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Total amount of PM/PM10 collected in the baghouses from all four plants =	7.50 lbs/hr
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Uncontrolled PM/PM10 Emissions =	7.52 lbs/hr
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Uncontrolled PM/PM10 Emissions =	32.95 tons/yr
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Methodology:

Control Efficiency = 99.7%

Uncontrolled PM/PM10 Emissions (lbs/hr) = Amount of PM/PM10 collected in the baghouses (lbs/hr) / Control Efficiency

Uncontrolled PM/PM10 Emissions (tons/yr) = Uncontrolled PM/PM10 Emissions (lbs/hr) * (1 ton/2000 lbs) * (8760 hrs/1 yr)

Note: The 7.50 lbs/hr is the total amount of PM/PM10 collected from all four of the plants.

Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations - Plant 1

Company Name: Creation Windows, Inc.

Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515

CP: 039-15413

Pit ID: 039-00230

Reviewer: ERG/AAB

Date: August 6, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Maximum Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Actual VOC pounds per hour	Actual VOC pounds per day	Actual VOC tons per year	Potential VOC tons per year	Particulate Actual (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Mineral Spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	165.0	711.3	6.58	6.58	0.53	2.97	0.54	2.34	0.00	0.00		100%
Uniroyal Silaprene	8.6	47.70%	0.0%	47.7%	0.0%	52.30%	105.6	455.2	4.09	4.09	0.21	1.18	0.22	0.93	0.00	0.00	7.83	100%
Isopropyl Alcohol	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	265.0	1142.4	6.55	6.55	0.85	4.76	0.87	3.74	0.00	0.00		100%
7030 Dolchem BLK	7.5	49.22%	0.0%	49.2%	0.0%	44.80%	1190.0	5130.1	3.69	3.69	2.16	12.04	2.20	9.47	0.00	0.00	8.24	100%
Permetex	8.8	13.50%	0.0%	13.5%	0.0%	0.00%	4.1	17.7	1.18	1.18	0.00	0.01	0.00	0.01	0.00	0.00		100%
7031 Clear Sealant	7.2	70.00%	7.2%	62.8%	0.0%	30.00%	240.0	1034.6	4.50	4.50	0.53	2.96	0.54	2.33	0.00	0.00	14.99	100%
Aktivator	5.9	33.00%	0.0%	33.0%	0.0%	0.00%	204.1	879.9	1.95	1.95	0.20	1.09	0.20	0.86	0.00	0.00		100%
3M UVAHH Promoter	6.8	94.00%	0.0%	94.0%	0.0%	0.00%	7.7	33.2	6.42	6.42	0.02	0.14	0.02	0.11	0.00	0.00		100%
Sika Polyurethane	9.4	3.00%	0.0%	3.0%	0.0%	97.00%	2550.0	10993.1	0.28	0.28	0.35	1.97	0.36	1.55	0.00	0.00	0.29	100%
Citra Solve	6.6	100.00%	5.0%	95.0%	4.0%	0.00%	40.0	172.4	6.52	6.26	0.12	0.69	0.13	0.54	0.00	0.00		100%
Safety Kleen	6.7	99.90%	0.0%	99.9%	0.0%	0.00%	95.0	409.5	6.65	6.65	0.31	1.73	0.32	1.36	0.00	0.00		100%

State Potential Emissions

Add worst case coating to all solvents

29.53 5.39 23.24 0.00 0.00 31.35

METHODOLOGY

Maximum Gal of Mat. (gal/year) = Gal of Mat. (gal/year)*(8760 hrs/2032 hrs)

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)

Actual VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/2032 hours

Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/365 days

Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 ton/2000 pounds

Particulate Actual Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(2032 hrs/yr) *(1 ton/2000 lbs)

Potential VOC Pounds per Hour = Actual VOC Pounds per Hour * (8760 hours/2032 hours)

Potential VOC Pounds per Day = Actual VOC Pounds per Day * (8760 hours/2032 hours)

Potential VOC Tons per Year = Actual VOC Tons per Year * (8760 hours/2032 hours)

Particulate Potential Tons per Year = Particulate Actual Tons per Year * (8760 hours/2032 hours)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer efficiency = 100% for hand application method

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Plant 2**

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Plt ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Max. Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Actual VOC pounds per hour	Actual VOC pounds per day	Actual VOC tons per year	Potential VOC tons per year	Particulate Actual (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Citra Solve	6.6	100.00%	5.0%	95.0%	4.0%	0.00%	35	151	6.52	6.26	0.11	0.60	0.11	0.47	0.00	0.00		100%
Schneemorhead 5555	9.1	34.68%	0.0%	34.7%	0.0%	58.30%	925	3988	3.16	3.16	1.44	8.01	1.46	6.30	0.00	0.00	5.42	100%
Schneemorhead 5504	8.5	46.44%	0.0%	46.4%	0.0%	45.30%	300	1293	3.95	3.95	0.58	3.24	0.59	2.55	0.00	0.00	8.71	100%

State Potential Emissions

Add worst case coating to all solvents

11.85 2.16 9.32 0.00 0.00 14.13

METHODOLOGY

Maximum Gal of Mat. (gal/year) = Gal of Mat. (gal/year)*(8760 hrs/2032 hrs)
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)
Actual VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/2032 hours
Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/365 days
Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 ton/2000 pounds
Particulate Actual Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(2032 hrs/yr) *(1 ton/2000 lbs)
Potential VOC Pounds per Hour = Actual VOC Pounds per Hour * (8760 hours/2032 hours)
Potential VOC Pounds per Day = Actual VOC Pounds per Day * (8760 hours/2032 hours)
Potential VOC Tons per Year = Actual VOC Tons per Year * (8760 hours/2032 hours)
Particulate Potential Tons per Year = Particulate Actual Tons per Year * (8760 hours/2032 hours)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Transfer efficiency = 100% for hand application method

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Plant 3**

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
PII ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Maximum Gal. of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Actual VOC pounds per hour	Actual VOC pounds per day	Actual VOC tons per year	Potential VOC tons per year	Particulate Actual (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Isopropyl Alcohol	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	95	410	6.55	6.55	0.31	1.70	0.31	1.34	0.00	0.00		100%
Permetex	8.8	13.50%	0.0%	13.5%	0.0%	0.00%	4.12	18	1.18	1.18	0.00	0.01	0.00	0.01	0.00	0.00		100%
Aktivator	5.9	33.00%	0.0%	33.0%	0.0%	0.00%	49.136	212	1.95	1.95	0.05	0.26	0.05	0.21	0.00	0.00		100%
Sika Polyurethane	9.4	3.00%	0.0%	3.0%	0.0%	97.00%	3150	13580	0.28	0.28	0.44	2.43	0.44	1.91	0.00	0.00	0.29	100%
Sikaflex 221 Polysealant	9.9	4.40%	0.0%	4.4%	0.0%	95.60%	56.448	243	0.44	0.44	0.01	0.07	0.01	0.05	0.00	0.00	0.46	100%
Safety Kleen	6.7	99.90%	0.0%	99.9%	0.0%	0.00%	12	52	6.65	6.65	0.04	0.22	0.04	0.17	0.00	0.00		100%
P-80 Emulsion Lubricant	8.3	0.00%	0.0%	0.0%	0.0%	0.00%	0.229	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		100%
Dolphin 7045 BLK Sealant	9.0	35.56%	0.0%	35.6%	0.0%	65.40%	930	4009	3.20	3.20	1.46	8.15	1.49	6.42	0.00	0.00	4.89	100%

State Potential Emissions

Add worst case coating to all solvents

12.85 2.35 10.11 0.00 0.00 5.64

METHODOLOGY

Maximum Gal of Mat. (gal/year) = Gal of Mat. (gal/year)*(8760 hrs/2032 hrs)

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)

Actual VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * 1 year/2032 hours

Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * 1 year/365 days

Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * 1 ton/2000 pounds

Particulate Actual Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(2032 hrs/yr) *(1 ton/2000 lbs)

Potential VOC Pounds per Hour = Actual VOC Pounds per Hour * (8760 hours/2032 hours)

Potential VOC Pounds per Day = Actual VOC Pounds per Day * (8760 hours/2032 hours)

Potential VOC Tons per Year = Actual VOC Tons per Year * (8760 hours/2032 hours)

Particulate Potential Tons per Year = Particulate Actual Tons per Year * (8760 hours/2032 hours)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer efficiency = 100% for hand application method

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Plant 4**

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Plt ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Maximum Gal. of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Actual VOC pounds per hour	Actual VOC pounds per day	Actual VOC tons per year	Potential VOC tons per year	Particulate Actual (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Buckeye Best Yet	8.4	95.00%	95.0%	0.0%	96.0%	5.00%	50.0	215.6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Uniroyal Silaprene	8.6	47.70%	0.0%	47.7%	0.0%	52.30%	82.0	353.5	4.09	4.09	0.17	0.92	0.17	0.72	0.00	0.00	7.83	100%
Isopropyl Alcohol	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	12.0	51.7	6.55	6.55	0.04	0.22	0.04	0.17	0.00	0.00		100%
Sika Polyurethane	9.4	3.00%	0.0%	3.0%	0.0%	97.00%	11.5	49.6	0.28	0.28	0.00	0.01	0.00	0.01	0.00	0.00	0.29	100%
Safety Kleen	6.7	99.90%	0.0%	99.9%	0.0%	0.00%	25.0	107.8	6.65	6.65	0.08	0.46	0.08	0.36	0.00	0.00		100%
Hydraulic Oil Citgo	7.3	0.00%	0.0%	0.0%	0.0%	0.00%	55.0	237.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		100%
Mer-lube Oil	7.0	0.00%	0.0%	0.0%	0.0%	0.00%	100.0	431.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		100%
Tru-seal	10.1	0.00%	0.0%	0.0%	0.0%	40.00%	1090.0	4699.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Dolphin Back Bedding	7.8	27.75%	0.0%	27.8%	0.0%	72.30%	2760.0	11898.4	2.15	2.15	2.92	16.26	2.97	12.79	0.00	0.00	2.97	100%
Dolphin Black Caulk	9.0	35.57%	0.0%	35.6%	0.0%	65.40%	365.0	1573.5	3.20	3.20	0.58	3.20	0.58	2.52	0.00	0.00	4.89	100%
Dolphin Silver Caulk	8.7	41.16%	0.0%	41.2%	0.0%	58.50%	70.0	301.8	3.60	3.60	0.12	0.69	0.13	0.54	0.00	0.00	6.15	100%
Dolphin White Caulk	8.8	41.16%	0.0%	41.2%	0.0%	56.60%	270.0	1164.0	3.60	3.60	0.48	2.66	0.49	2.10	0.00	0.00	6.36	100%
Glass Supplies Cutting Fluid	6.9	100.00%	100.0%	0.0%	0.0%	0.00%	24.0	103.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		100%
Spartan Orange Drain Cleaner	9.4	3.00%	0.0%	3.0%	0.0%	97.00%	150.0	646.7	0.28	0.28	0.02	0.12	0.02	0.09	0.00	0.00	0.29	100%

State Potential Emissions **Add worst case coating to all solvents** **24.53 4.48 19.30 0.00 0.00 28.79**

METHODOLOGY

Maximum Gal of Mat. (gal/year) = Gal of Mat. (gal/year)*(8760 hrs/2032 hrs)
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)
Actual VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/2032 hours
Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 year/365 days
Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Galof Material (gal/year) * 1 ton/2000 pounds
Particulate Actual Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(2032 hrs/yr) *(1 ton/2000 lbs)
Potential VOC Pounds per Hour = Actual VOC Pounds per Hour * (8760 hours/2032 hours)
Potential VOC Pounds per Day = Actual VOC Pounds per Day * (8760 hours/2032 hours)
Potential VOC Tons per Year = Actual VOC Tons per Year * (8760 hours/2032 hours)
Particulate Potential Tons per Year = Particulate Actual Tons per Year * (8760 hours/2032 hours)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Transfer efficiency = 100% for hand application method

**Appendix A: Emissions Calculations
Total HAPs From All Four Plants**

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Plt ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Material	Density (Lb/Gal)	Maximum (gal/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone (ton/yr)
7030 Dolchem BLK	7.5	5130.1	0.00%	25.00%	0.00%	0.00	4.81	0.00
7031 Clear Sealant	7.16	1034.6	0.00%	20.00%	0.00%	0.00	0.74	0.00
3M UVAHH Promoter	6.83	33.2	35.00%	0.00%	0.00%	0.04	0.00	0.00
Sikaflex 221	9.91	243.0	5.00%	0.00%	0.00%	0.06	0.00	0.00
Schneemorhead 5555	9.11	3988.0	0.00%	9.70%	0.00%	0.00	1.76	0.00
Schneemorhead 5504	8.5	1293.0	0.00%	44.00%	0.00%	0.00	2.42	0.00
Uniroyal Silaprene	8.58	808.7	0.00%	47.70%	0.00%	0.00	1.65	0.00
Safety Kleen	6.66	569.3	1.00%	0.50%	0.00%	0.02	0.01	0.00
Dolphin Back Bedding	7.75	11898.4	0.00%	26.00%	0.00%	0.00	11.99	0.00
Dolphin Black Chaulk	9	1573.5	0.00%	33.00%	4.00%	0.00	2.34	0.28
Dolphin Silver Chaulk	8.75	301.8	0.00%	39.00%	4.00%	0.00	0.51	0.05
Dolphin White Chaulk	8.75	1164.0	0.00%	39.00%	4.00%	0.00	1.99	0.20
Dolphin 7045 BLK Sealant	9	4009.0	0.00%	39.00%	4.00%	0.00	7.04	0.72

Total State Potential Emissions

0.12

35.26

1.26

METHODOLOGY

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR<100

Space Heaters

Company Name: Creation Windows, Inc.

Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515

CP: 039-15413

Plt ID: 039-00230

Reviewer: ERG/AAB

Date: August 6, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.4

20.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.02	0.08	0.01	1.04	0.06	0.88

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable 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 from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

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

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Heaters

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Pit ID: 039-00230
Reviewer: ERG/ARB
Date: June 12, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.194E-05	1.254E-05	7.835E-04	1.880E-02	3.552E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.223E-06	1.149E-05	1.462E-05	3.970E-06	2.194E-05

Total HAPs = 1.971E-02 tpy

Methodology is the same as previous page.

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

Appendix A: Emission Calculations
 Summary Table

Company Name: Creation Windows, Inc.
Address City IN Zip: 53061 Ada Drive, Elkhart, Indiana 46515
CP: 039-15413
Plt ID: 039-00230
Reviewer: ERG/AAB
Date: August 6, 2003

Potential to Emit in tons/year

Unit	PM	PM10	SO2	NOx	VOC	CO	HAPs
Surface Coating - Plant 1	-----	-----	-----	-----	23.24	-----	36.64
Surface Coating - Plant 2	-----	-----	-----	-----	9.32	-----	
Surface Coating - Plant 3	-----	-----	-----	-----	10.11	-----	
Surface Coating - Plant 4	-----	-----	-----	-----	19.30	-----	
Aluminum Sawing From All 4 Plants	32.95	32.95	-----	-----	-----	-----	-----
Heaters	0.02	0.08	0.01	1.04	0.06	0.88	0.02
Total	32.97	33.03	0.01	1.04	62.04	0.88	36.66