



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

April 8, 2004

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: Fairmont Homes, Inc. and Kustom Woodworking / T039-17652-00509

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Fairmont Homes, Inc. and Kustom Woodworking  
502 South Oakland Avenue and 625 South Oakland Avenue  
Nappanee, Indiana 46550**

(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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17652-00509	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 8, 2004  Expiration Date: April 8, 2009

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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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates two stationary framed home manufacturing plants.

Responsible Official: James F. Shea  
Source Address: Fairmont Homes, Inc., 502 S. Oakland Avenue,  
Nappanee, Indiana 46550; and  
Kustom Woodworking, 625 S. Oakland Avenue,  
Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes, Inc, P.O. Box 27, Nappanee,  
Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee,  
Indiana 46550.  
General Source Phone Number: (574) 773-7941  
SIC Code: 2451 and 2499  
County Location: Elkhart  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Fairmont Homes, Inc is located at 502 S. Oakland Ave., Nappanee, Indiana 46550; and
- (b) Kustom Woodworking is located at 625 S. Oakland Ave., Nappanee, Indiana 46550.

Since the two (2) companies are located on contiguous properties, belong to the same industrial grouping and have the same first two-digit SIC codes, and are owned by one (1) company, they will be considered one (1) source.

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

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

- (a) The Fairmont Homes, Inc plant consist of the following facilities:
  - (1) One (1) airless vapor barrier application system, located in Building 1, with a maximum coating capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1.
  - (2) Two (2) flow-coating foam application systems, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.
  - (3) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.

- (4) One (1) flow-coating adhesive application system, located in Building 1C, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (5) Two (2) flow-coating foam application systems, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (6) One (1) airless vapor barrier application system, located in Building 5, with a maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (7) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (8) One (1) flow-coating adhesive application system, located in Building 5A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (9) Two (2) flow-coating foam application systems, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (10) One (1) airless vapor barrier application system, located in Building 7, with a maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (11) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (12) One (1) flow-coating adhesive application system, located in Building 7A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (13) Two (2) flow-coating foam application systems, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (14) One (1) airless vapor barrier application system, located in Building 12, with a maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (15) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (16) One (1) flow-coating adhesive application system, located in Building 12B, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (17) Two (2) airless paint application systems, located in Building 14/16, with a total maximum coating capacity of 1.5 floors per hour, having a back up for each pump that is used for breakdowns, and exhausting to eight (8) vents, all identified as V-5.
- (18) One (1) airless paint application system, located in Building 14/16, with a maximum coating and texturing capacity of 1.5 floors per hour, and exhausting to

eight (8) vents, all identified as V-5.

- (19) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 14/16, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to eight (8) vents, all identified as V-5.
- (20) Two (2) high volume-low pressure (HVLP) adhesive application systems, located in Building 22, with a total maximum coating capacity of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4.
- (21) Facilities using VOC containing adhesives, located in Building 22, with a total maximum coating capacity of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4.
- (22) Woodworking equipment, located in Building 1, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-1.
- (23) Woodworking equipment, located in Building 1A, equipped with one (1) cyclone/baghouse system for particulate control, and exhausting to one (1) stack, identified as D-2.
- (24) Woodworking equipment, located in Building 5, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-53.
- (25) Woodworking equipment, located in Building 5A/7A, and exhausting inside the building.
- (26) Woodworking equipment, located in Building 12, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-3.
- (27) Woodworking equipment, located in Building 14/16, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-141.
- (28) Woodworking equipment, located in Building 22, equipped with two (2) cyclone/baghouse systems for particulate control, and exhausting to two (2) stacks, identified as D-142 .

(b) The Kustom Woodworking plant consists of the following facilities:

- (1) Nine (9) spray booths, identified as EU1, using air-assisted airless equipment, each with a maximum capacity of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters and each exhausting to one (1) stack identified as S-1 through S-9 respectively.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour
  - (1) One (1) natural gas-fired boiler, constructed in 1988, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in Building 14 [326 IAC 6-2-4].
- (b) Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings [326 IAC 6-3].

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

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

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

## SECTION B

## GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [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.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

### B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All 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

and

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

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

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 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) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal** [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ,, upon receiving a timely and complete permit application, fails to

issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.17 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (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 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.19 Operational Flexibility** [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

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

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

and

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

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

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

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with

326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative

enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

- C.1 **Particulate 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. This condition is not federally enforceable.
- C.2 **Opacity [326 IAC 5-1]**
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2 is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
- Except as otherwise provided by statute or 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.7 **Stack Height [326 IAC 1-7]**
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.8 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

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

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

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

**C.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 2-7-5] [326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February, 1999.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

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- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (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 Commission 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

- (a) The Fairmont Homes, Inc plant consist of the following facilities:
- (1) One (1) airless vapor barrier application system, located in Building 1, with a maximum coating capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1.
  - (2) Two (2) flow-coating foam application systems, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.
  - (3) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.
  - (4) One (1) flow-coating adhesive application system, located in Building 1C, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
  - (5) Two (2) flow-coating foam application systems, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
  - (6) One (1) airless vapor barrier application system, located in Building 5, with a maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
  - (7) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
  - (8) One (1) flow-coating adhesive application system, located in Building 5A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
  - (9) Two (2) flow-coating foam application systems, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
  - (10) One (1) airless vapor barrier application system, located in Building 7, with a maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
  - (11) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
  - (12) One (1) flow-coating adhesive application system, located in Building 7A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
  - (13) Two (2) flow-coating foam application systems, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.

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

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

- (14) One (1) airless vapor barrier application system, located in Building 12, with a maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
  - (15) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
  - (16) One (1) flow-coating adhesive application system, located in Building 12B, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
  - (17) Two (2) airless paint application systems, located in Building 14/16, with a total maximum coating capacity of 4.0 floors per hour, having a back up for each pump that is used for breakdowns, and exhausting to eight (8) vents, all identified as V-5.
  - (18) One (1) airless paint application system, located in Building 14/16, with a maximum coating and texturing capacity of 1.5 floors per hour, and exhausting to eight (8) vents, all identified as V-5.
  - (19) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 14/16, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to eight (8) vents, all identified as V-5.
  - (20) Two (2) high volume-low pressure (HVLP) adhesive application systems, located in Building 22, with a total maximum coating capacity of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4.
  - (21) Facilities using VOC containing adhesives, located in Building 22, with a total maximum coating capacity of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4.
- (b) The Kustom Woodworking consists of the following facilities:
- (1) Nine (9) spray booths, identified as EU1, using air-assisted airless equipment, each with a maximum capacity of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters and each exhausting to one (1) stack identified as S-1 through S-9 respectively.

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

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

**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2, this source is a major stationary source because the potential to emit VOC is greater than 250 tons per year. This source is not 1 of 28 listed sources and there are no major modifications with emission increase greater than PSD significant levels. However, due to the fact that Fairmont Homes and Kustom Woodworking have accepted significant threshold limits on their surface coating and woodworking equipment, the source has never received a PSD permit. The facilities are limited as follows:

- (a) The Fairmont Homes surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period, with compliance determined at the end of each month.
- (b) The Kustom Woodworking surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period, with compliance determined at the end of each month.

Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to OP T039-6992-00509, issued on February 25, 1999 and 40 CFR 52 Subpart P, the PM from the spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

#### D.1.5 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

#### D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ][326 IAC 20]

- (a) The wood surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.800, Subpart JJ), with compliance date of December 7, 1998 (Note: The compliance date for this existing source is December 7, 1998 because actual HAP emissions for the source were less than 50 tons in 1996).
- (b) The surface coating operations that are subject to 326 IAC 20-14 (40 CFR 63, Subpart JJ) at this source shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP)

- content across all coatings of one (1.0) pound VHAP per pound solids;  
or
- (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1) pound VHAP per pound solids.
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

#### D.1.7 Work Practice Standards [40 CFR 63.803][326 IAC 20]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## **Compliance Determination Requirements**

**D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63][326 IAC 20]**

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- (1) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (2) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAP limit specified in Conditions D.1.2 and D.1.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.10 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.11 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and vents while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

**D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC content of each coating material and solvent used, including solvent used for cleanup and thinners on monthly basis. Records shall

- include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.6.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) An Initial Compliance Report to document compliance with Condition D.1.6 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998, if the source had actual emissions less than 50 tons of HAPs during 1996). The Initial Compliance Report must include data from the entire month that the compliance date falls. The initial compliance report was submitted to IDEM on February 3, 1999.

- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.6 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.

- (d) The reports required in (b) and (c) of this condition shall be submitted to:

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

and

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

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

Woodworking equipment located in Fairmont Homes, Inc.:

- (1) Woodworking equipment, located in Building 1A, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-1
- (2) Woodworking equipment, located in Building 1A, equipped with one (1) cyclone/baghouse system for particulate control, and exhausting to one (1) stack, identified as D-2.
- (3) Woodworking equipment, located in Building 5, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-53
- (4) Woodworking equipment, located in Building 5A/7A, and exhausting inside the building.
- (5) Woodworking equipment, located in Building 12, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-3.
- (6) Woodworking equipment, located in Building 14/16, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-141.
- (7) Woodworking equipment, located in Building 22, equipped with two (2) cyclone/baghouse systems for particulate control, and exhausting to two (2) stacks, identified as D-142 .

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

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

**D.2.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and OP T039-6992-00509, the allowable particulate emission rate from the woodworking facilities shall be limited as follows:

Building	PM Control Equipment	Process Weight Rate (tons per hour)	Allowable Emission Rate (pounds per hour)
1	Cyclone D-1	0.08	0.77
1A	Baghouse/Cyclone D-2	10.35	19.62
5	Cyclone D-53	0.05	0.551
5A/7A	no control	0.33	1.96
12	Cyclone D-3	0.07	0.67
14	Cyclone D-141	0.05	0.57
22	Cyclone/Baghouse D-142	1.63	5.68
22	Cyclone/Baghouse	0.42	2.29

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

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

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

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

**D.2.2 Opacity [326 IAC 2-1-3(i) (8)]**

Pursuant to T039-6992-00509, issued on February 25, 1999, the visible PM emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

**D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.2.4 Particulate Control**

Pursuant to T039-6992-00509, issued on February 25, 1999, and in order to comply with condition D.2.1, for woodworking equipment with baghouses and cyclones, the baghouses and cyclones for particulate control shall be in operation and control emissions from the woodworking equipment at all times that the woodworking equipment is in operation.

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

**D.2.5 Visible Emissions Notations**

- (a) Daily visible emission notations of the woodworking equipment stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

**D.2.6 Baghouse Inspections**

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

#### D.2.7 Broken or Failed Bag Detection

---

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.2.8 Cyclone Inspections

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

#### D.2.9 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.2.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking facility stack exhausts.
- (b) To document compliance with Condition D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and D.2.8 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

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

One (1) natural gas-fired boiler, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in Building 14.

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

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

**D.3.1 Particulate [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 4.72 MMBtu per hour heat input boiler shall be limited 0.6 pounds per MMBtu for total source maximum operating capacity rating of less than 10 MMBtu per hour.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Fairmont Homes Inc. and Kustom Woodworking  
Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550.  
Mailing Address: Fairmont Homes Inc., P.O. Box. 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509

**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:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- 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:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Fairmont Homes, Inc and Kustom Woodworking  
Source Address: Fairmont Homes, Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes, Inc., P.O. Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C The Permittee must submit notice in writing or by facsimile within two (2) 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, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Fairmont Homes Inc. and Kustom Woodworking  
Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509  
Facility: Fairmont Homes Inc. Surface Coating Facilities.  
Parameter: VOC  
Limit: Less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period.

YEAR: \_\_\_\_\_

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Fairmont Homes Inc. and Kustom Woodworking  
Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509  
Facility: Kustom Woodworking Surface Coating Facilities.  
Parameter: VOC  
Limit: Less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period.

YEAR: \_\_\_\_\_

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 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 MANAGEMENT  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 Semi-Annual Report  
 VOC and VHAP usage - Wood Furniture NESHAP**

Source Name: Fairmont Homes, Inc. and Kustom Woodworking  
 Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
 and  
 Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
 Mailing Address: Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
 Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
 Part 70 Permit No.: T039-17652-00509  
 Facility: Surface Coating  
 Parameter: VOC and VHAPs - NESHAP  
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids  
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3%  
 VHAP content by weight  
 (3) All other thinner mixtures - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb  
 VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

☛ No deviation occurred in this six month period.

☛ Deviation/s occurred in this six month period.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

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

Source Name: Fairmont Homes, Inc. and Kustom Woodworking  
Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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 checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

**Source Name:** Fairmont Homes, Inc and Kustom Woodworking  
**Source Location:** 502 S. Oakland Avenue and 625 S. Oakland Avenue  
Nappanee, Indiana 46550  
**County:** Elkhart  
**SIC Code:** 2451, 2499  
**Operation Permit No.:** T039-17652-00509  
**Permit Reviewer:** Femi Ogunsola/EVP

On November 17, 2003, the Office of Air Quality (OAQ) had a notice published in The Truth, Elkhart, Indiana, stating that Fairmont Homes, Inc and Kustom Woodworking had applied for a Part 70 Operating Permit renewal relating to the operation of framed home manufacturing processes. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed Part 70 permit renewal 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 renewal should be issued as proposed.

On December 22, 2003, Jack Wise of Fairmont Homes, Inc. and Kustom Woodworking, submitted comments on the proposed Part 70 Operating Permit Renewal. The summary of the comments and the corresponding responses are as follows:

**Comment 1: Section A.3 and the TSD** should be revised to expressly include the already existing insignificant activity “any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS”, of the stomp ceiling application system. The MSDS and VOC Data sheet of the material (topping joint compound ready-mixed) is included in this packet of information. The VOC weight percent is .06 % and there are no HAPs in the material. Emissions of this process are below the insignificant activity.

- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to three (3) vents, all identified as V1. [Fairmont Homes – Building 1]
- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to four (4) vents, all identified as V3. [Fairmont Homes – Building 5]
- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to five (5) vents, all identified as V6. [Fairmont Homes – Building 7]
- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to three (3) vents, all identified as V2. [Fairmont Homes – Building 12]

**Comment 2: Section A.3 and the TSD** should be revised to expressly include the already existing insignificant activity “any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS”, of the paint application system. The MSDS and VOC Data sheet of the material (B30W401 Dover White) is included in this packet of information. The VOC weight percent is .87 % and there are no HAPs in the material. Emissions of this process are below the insignificant activity.

- One (1) airless paint application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and exhausting to three (3) vents, all identified as V1. [Fairmont Homes – Building 1]
- One (1) airless paint application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and exhausting to four (4) vents, all identified as V3. [Fairmont Homes – Building 5]
- One (1) airless paint application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and exhausting to five (5) vents, all identified as V6. [Fairmont Homes – Building 7]
- One (1) airless paint application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and exhausting to three (3) vents, all identified as V2. [Fairmont Homes – Building 12]

### **Response to Comments 1 and 2**

The insignificant activity described as “any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS” as well as the listed stomp ceiling application system will not be included in Section A.3 because Section A.3 emission units list contains facilities with emissions greater than the threshold of insignificant activities. These emission units with unrestricted potential to emit below the threshold of insignificant activities could neither be listed as insignificant activities in Section A.4 since they are below the threshold of insignificant activities. Even if they are insignificant activities they can't be listed unless requested. Only regulated insignificant activities are listed in Section A.4. However, this list will be included in this TSD addendum to acknowledge that the list of equipment with emissions below the insignificant activity threshold.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM OAQ agrees that the TSD should have read as follows:

### **List of Equipment with emissions below Insignificant Activity threshold**

- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to three (3) vents, all identified as V1. [Fairmont Homes – Building 1];**
- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to four (4) vents, all identified as V3. [Fairmont Homes – Building 5];**
- One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to five (5) vents, all identified as V6. [Fairmont Homes – Building 7]; and**

- (d) **One (1) airless texture stomp ceiling application system, coating a maximum capacity of 1.5 floors/hour, with overspray controlled by stationary walls and the density of the product and exhausting to three (3) vents, all identified as V2. [Fairmont Homes – Building 12].**

**Comment 3: Current Permit Condition B.15 “Multiple Exceedances”**

The current Part 70 Permit for this source includes a Condition B.15 which states that “Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit”. This condition should remain in the Part 70 Permit to avoid confusion and to establish the permittee’s rights clearly.

**Response to Comment 3**

On December 11, 2001, U.S. EPA published a Notice of Deficiency in the Federal Register identifying the following regulatory deficiency: "Indiana rule 326 IAC 2-7-5(1)(E) considers an exceedance of a permit limit and the corresponding operating parameter as only one violation. This rule provision restricts the state's enforcement authority to restrain or enjoin and to assess a civil penalty for the violation of any permit condition as required by 40 CFR 70.11. Therefore, Indiana's program does not meet the program requirements of title V and 40 CFR part 70. Indiana is in the process of correcting this rule provision. Indiana will remove this language from its rules by deleting paragraph 326 IAC 2-7-5(1)(E)." On October 3, 2001, the rule revision which repealed 326 IAC 2-7-5(1)(E) was adopted and became effective January 19, 2002. B.15 Multiple Exceedances will not be included in this permit, because it would be in conflict with 40 CFR 70 and 326 IAC 2-7.

In view of the above, IDEM, OAQ no longer requires this condition, and would not reinstate into the Part 70 permit renewal. Therefore, the condition for “Mutiple Exceedances” will still be excluded from this Part 70 permit renewal. Removing this condition from permit will neither cause any confusion nor Permittee’s rights in any way whatsoever. IDEM, OAQ has put in place other conditions and requirements that guarantees the Permittee’s rights and avoids any confusion that the inclusion or exclusion of this condition may cause.

**Comment 4: Condition C.13**

There is a different condition on permit renewals that does not require them to resubmit this ERP. Since this is a permit renewal the ERP has already been completed for the past 5-year permit. This should be stated and a new ERP should not need to be submitted for reapproval within ninety (90) days after the date of issuance of this permit renewal.

**Response to Comment 4:**

Condition C.13 is revised as follows:

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

---

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

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

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

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

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

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

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

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]~~

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

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

**(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 3, 1999.**

**(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3].**

**Comment 5: Condition D.1.6(b)**

To avoid any confusion this should specify that it is only referring to surface coating operations that are subject to 20-14 (Subpart JJ). Suggest something like: "The surface coating operations of this source that are subject to 326 IAC 20-14 (40 CFR 63, Subpart JJ) shall comply with the following conditions:

**Response to Comment 5**

Condition D.1.6(b) has been amended as requested as follows:

- (b) The surface coating operations **that are subject to 326 IAC 20-14 (40 CFR 63, Subpart JJ)** of at this source shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C).

**Comment 6: Condition D.1.10**

There are no VOC limits in condition D.1.1. Therefore, D.1.1 should be deleted and the referenced conditions should be D.1.2 for VOC emissions and D.1.6 for VHAP emissions.

**Response to Comment 6**

Condition D.1.10 has been corrected as below:

**D.1.10 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.1~~ and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Comment 7: Condition D.1.12(a)(2)(B)and (a)(3)**

It is not necessary to differentiate solvent usage records between those added to coatings and those used as cleanup solvents for compliance with the D.1.2 emission limits. Therefore D.1.12(a)(2)(B) and (a)(3) should be deleted. D.1.12(a)(2) already requires records of all coatings & solvents used. Due to these revisions and to improve the clarity of the condition, we also request that the entire paragraph (a) be revised consistent with the current Part 70 Permit, as follows:

- (a) To document compliance with ... in accordance with (1) through **(3)** below. Records maintained for (1) through **(3)** shall be taken ...
- (1) The amount and VOC content of each coating material and solvent used, including solvent used for cleanup and thinners. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.

### **Response to Comment 7**

IDEM, OAQ agrees that there is no need to differentiate solvent usage records between those added to coatings and those used as cleanup solvents for compliance with the D.1.2 emission limits. Therefore, Condition D.1.12 (a) has been revised as follows:

- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through ~~(53)~~ below. Records maintained for (1) through ~~(53)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. 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.~~ **The amount and VOC content of each coating material and solvent used, including solvent used for cleanup and thinners on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used**
  - ~~(2) The amount of coating material and solvent used on 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 cleanup solvent usage for each month;~~
  - (42) The total VOC usage for each month; and
  - ~~(53)~~ The weight of VOCs emitted for each compliance period.

### **Comment 8: Condition D.1.12(e)**

D.1.10 has no monitoring requirements & should be deleted from this condition. Also, the requirement to keep preventative maintenance records is already in Condition D.1.12(d), so it can be deleted from (e). This section would then read as follows: "To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections."

### **Response to Comment 8**

Condition D.1.12(e) has been revised to removed Condition D.1.10 from Condition D.1.12(e) and also the requirements to keep the preventive maintenance records as follows:

- (e) To document compliance with Conditions ~~D.1.10 and~~ D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~

**Comment 9: Condition D.1.13(a)**

This is a quarterly report requirement so the submittal should be within 30 days of the end of the **quarter** being reported. (not the 6 months).

**Response to Comment 9**

Condition D.1.13 (a) has been revised as follows:

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the ~~six (6) month~~ **quarter** period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Comment 10: Condition D.2.4**

This condition should provide exception for the operation of woodworking equipment without the baghouses and cyclones for particulate control when allowed in accordance with Condition D.2.7. The following phrase should be added to the end of the last sentence in Condition D.2.4: ", except as provided in Condition D.2.7."

**Response to Comment 10**

IDEM, OAQ has agreed to amend Condition 2.4 to make an exception for the operation of woodworking equipment without the baghouses and cyclones for particulate control is by adding a phrase: "for woodworking equipment with baghouses and cyclones". This would avoid any confusion and also it would not be necessary to add the suggested phrase "except as provided in Condition D.2.7." Therefore, the condition D.2.4 has been revised as follows:

**D.2.4 Particulate Control**

---

Pursuant to T039-6992-00509, issued on February 25, 1999, and in order to comply with condition D.2.1, **for woodworking equipment with baghouses and cyclones**, the baghouses and cyclones for particulate control shall be in operation and control emissions from the woodworking equipment at all times that the woodworking equipment is in operation.

**Comment 11: Quarterly Reports**

D.1.2 contains separate 250 TPY VOC limits for Fairmont and Kustom but there is only one Quarterly Report for Fairmont only. Another report form for the Kustom 250 TPY limit needs to be added.

**Response to Comment 11**

The Quarterly Report form for Kustom Woodworking has been included in the permit and the limit for Fairmont Homes has been modified to be more specific as follows:

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

## Part 70 Quarterly Report

Source Name: Fairmont Homes Inc. and Kustom Woodworking  
Source Address: Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
Mailing Address: Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-17652-00509  
Facility: Fairmont Homes Inc. Surface Coating Facilities.  
Parameter: VOC  
Limit: Less than 250 tons of VOC, including coatings, **dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.**

YEAR:

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

**Source Name:** Fairmont Homes Inc. and Kustom Woodworking  
**Source Address:** Fairmont Homes Inc., 502 South Oakland Avenue, Nappanee, Indiana 46550;  
and  
Kustom Woodworking, 625 South Oakland Avenue, Nappanee, Indiana 46550  
**Mailing Address:** Fairmont Homes Inc., P.O.Box 27, Nappanee, Indiana 46550; and  
Kustom Woodworking, P.O. Box 366, Nappanee, Nappanee, Indiana 46550  
**Part 70 Permit No.:** T039-17652-00509  
**Facility:** Kustom Woodworking Surface Coating Facilities.  
**Parameter:** VOC  
**Limit:** Less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.

**YEAR:**

<b>Month</b>	<b>VOC Usage This Month (tons)</b>	<b>VOC Usage Previous 11 Months (tons)</b>	<b>Total VOC Usage 12 Month Period (tons)</b>

- 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.**

**Comment 12: TSD**

The Permitted Emission Units and Pollution Control Equipment section stated in the current permit that “The Fairmont Homes and Showcase Homes plants consist of the following permitted emission units and pollution control devices.” In the draft nothing has been stated about Showcase Homes. We ask that it be revised to read “(a) The Fairmont Homes, Inc plant, which includes its subsidiary Showcase Homes, consists of the following facilities:”

**Response to Comment 12**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support materials that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The Permitted Emission Units and Pollution Control Equipment section of the TSD has been revised as follows:

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) The Fairmont Homes, Inc. plant, **which includes its subsidiary Showcase Homes**, consists of the following facilities:

**Comment 13: A.3 (17 & 18 & 19), D.1 (17 & 18 & 19) and TSD (17 & 18 & 19)**

These Paragraphs 17, 18, and 19 have each referred to the capacity incorrectly. In paragraph 17, for Building 14/16, it states “the total maximum coating capacity to be 0.33 walls and ceilings per hour.” This statement should have been corrected to 1.5 floors per hour. (An additional revision below will actually request further changes to paragraph 17.) In paragraph 18, “the total maximum coating and texturing capacity of 0.33 ceilings per hour” also needs to be changed to 1.5 floors per hour. In paragraph 19, “the total maximum coating capacity of 0.33 floors per hour” should be corrected to “1.5 floors per hour”. The correction from a factor of 0.33 to 1.5 is not an increase of production. It has been typical of Fairmont Homes to use floors, instead of ceilings and walls, as our determining factor and it was overlooked in these statements at the time the current permit was originally issued. It is noted that paragraph 1 – 16 do correctly refer to a capacity of 1.5 floors per hour.

With the market changing from vinyl covered gypsum to now painted gypsum, we see an increase in painting of walls required beyond the 1.5 floors per hour. Currently, Fairmont Homes is in the process of changing the location of where painting of the walls will be done. To do this efficiently, we will be increasing the walls painted in Building 14/16. We will be painting the walls for Buildings 1, 5, 7 and 12 in Building 14/16. This increase, in Building 14/16, will not result in an increase of equipment, but will increase the paint usage for the walls. At this time, Fairmont Homes does intend to maintain the permit or paint systems applications at Buildings 1, 5, 7, and 12. To describe in a visual way, this change in process will have 2 separate lines in Building 14/16. Each line, with several stations, will do 2 floors simultaneously, which is equal to one house. Meaning for the proposed 2 separate lines, a total of four floors will be done per hour.

Therefore, only paragraph 17, for Building 14/16, should be revised due to the increased paint usage to state “Two (2) airless paint application systems, located in Building 14/16, with a total maximum coating capacity of 4 floors per hour, having a backup for each pump that is used for breakdowns, and exhausting to eight (8) vents, all identified as V-5.”

The paint product being used is a current product. It is the B30W401 Dover White Paint. The VOC weight is .87% and there are not HAPs in the material. This product is the same product as in Comment 2 of this document, which is considered a insignificant activity because it is an aqueous solution containing less than 1% by weight of VOCs, excluding HAPS. The MSDS and VOC data sheet was submitted in the renewal packet.

Because no additional homes will produced by the painted wall increase, there is no increase in the production of ceilings which will continue to be coated in Buildings 1, 5, 7 and 12 at a rate of 1.5 floors per hour. There is no change required to the paragraphs describing the paint system capacities for building 1, 5, 7 and 12.

### **Response to Comment 13**

IDEM, OAQ agrees to change the descriptions of the facilities listed in Section A.3 (17, 18 and 19) to state the correct total maximum capacities of these facilities as requested. However, the request to change the total maximum capacity for the facility listed in Section A.3 (17) from the corrected 1.5 to 4.0 floors per hour will not be granted. The increase in total maximum capacity from 1.5 to 4.0 floors per hour would increase the potential to emit of VOC by 26 tons per year (estimate). This request will require a combined application for Significant Source Modification (SSM) and Significant Permit Modification (SPM) to be submitted to IDEM before such change can be approved. Therefore, the descriptions of facilities in Section A.3 (17 & 18 & 19), D.1 (17 & 18 & 19) and TSD (17 & 18 & 19) have been revised as follows:

- (17) Two (2) airless paint application systems, located in Building 14/16, with a total maximum coating capacity of ~~0.33 walls and ceilings~~ **1.5 floors** per hour, having a back up for each pump that is used for breakdowns, and exhausting to eight (8) vents, all identified as V-5.
- (18) One (1) airless paint application system, located in Building 14/16, with a maximum coating and texturing capacity of ~~0.33 ceilings~~ **1.5 floors** per hour, and exhausting to eight (8) vents, all identified as V-5.
- (19) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 14/16, with a total maximum coating capacity of ~~0.33~~ **1.5 floors** per hour, and exhausting to eight (8) vents, all identified as V-5.

### **Comment 14: A.4 (a)(2)**

The small woodworking equipment described in section A.4 (a)(2) has been incorrectly grouped under (a) Natural gas-fired combustion sources. The small woodworking equipment should be set forth as section A.4(b).

### **Response to Comment 14**

Section A.4 has been revised as follows:

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

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

- (a) Natural gas –fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired boiler, constructed in 1988, identified as Boiler 14, with heat input capacity of 4.72 million Btu per hour, and exhausting in Building 14 [326 IAC 6-2-4].
  - (2) ~~Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings [326 IAC 6-3].~~
- (b) **Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings [326 IAC 6-3].**

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

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

**Source Background and Description**

**Source Name:** Fairmont Homes, Inc. and Kustom Woodworking  
**Source Location:** 502 S. Oakland Avenue and 625 S. Oakland Avenue,  
Nappanee, Indiana 46550  
**County:** Elkhart  
**SIC Code:** 2451, 2499  
**Operation Permit No.:** T039-17652-00509  
**Permit Reviewer:** Femi Ogunsola/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Fairmont Homes, Inc and Kustom Woodworking relating to the operation of a framed home manufacturing process. Fairmont Homes, Inc. and Kustom Woodworking was issued Part 70 Permit No. T039-6992-00509 on February 25, 1999.

**Source Definition**

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

- (a) Fairmont Homes, Inc. is located at 502 S. Oakland Ave., Nappanee, Indiana 46550; and
- (b) Kustom Woodworking is located at 625 S. Oakland Ave., Nappanee, Indiana 46550.

Since the two (2) companies are located on contiguous properties, have the same first two-digit SIC codes and are owned by one (1) company, they will be considered one (1) source.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) The Fairmont Homes, Inc. plant consists of the following facilities:
  - (1) One (1) airless vapor barrier application system, located in Building 1, with a maximum coating capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1.
  - (2) Two (2) flow-coating foam application systems, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.
  - (3) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 1, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1.

- (4) One (1) flow-coating adhesive application system, located in Building 1C, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (5) Two (2) flow-coating foam application systems, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (6) One (1) airless vapor barrier application system, located in Building 5, with a maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (7) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 5, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3.
- (8) One (1) flow-coating adhesive application system, located in Building 5A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (9) Two (2) flow-coating foam application systems, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (10) One (1) airless vapor barrier application system, located in Building 7, with a maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (11) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 7, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6.
- (12) One (1) flow-coating adhesive application system, located in Building 7A, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.
- (13) Two (2) flow-coating foam application systems, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (14) One (1) airless vapor barrier application system, located in Building 12, with a maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (15) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 12, with a total maximum coating capacity of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2.
- (16) One (1) flow-coating adhesive application system, located in Building 12B, with a maximum coating capacity of 1.5 floors per hour, and exhausting inside the building.

- (17) Two (2) airless paint application systems, located in Building 14/16, with a total maximum coating capacity of 0.33 walls and ceilings per hour, having a back up for each pump that is used for breakdowns, and exhausting to eight (8) vents, all identified as V-5.
  - (18) One (1) airless paint application system, located in Building 14/16, with a maximum coating and texturing capacity of 0.33 ceilings per hour, and exhausting to eight (8) vents, all identified as V-5.
  - (19) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials, located in Building 14/16, with a total maximum coating capacity of 0.33 floors per hour, and exhausting to eight (8) vents, all identified as V-5.
  - (20) Two (2) high volume-low pressure (HVLP) adhesive application systems, located in Building 22, with a total maximum coating capacity of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4.
  - (21) Facilities using VOC containing adhesives, located in Building 22, with a total maximum coating capacity of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4.
  - (22) Woodworking equipment, located in Building 1, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-1 .
  - (23) Woodworking equipment, located in Building 1A, equipped with one (1) cyclone/baghouse system for particulate control, and exhausting to one (1) stack, identified as D-2.
  - (24) Woodworking equipment, located in Building 5, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-53.
  - (25) Woodworking equipment, located in Building 5A/7A, and exhausting inside the building.
  - (26) Woodworking equipment, located in Building 12, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-3.
  - (27) Woodworking equipment, located in Building 14/16, equipped with one (1) cyclone for particulate control, and exhausting to one (1) stack, identified as D-141.
  - (28) Woodworking equipment, located in Building 22, equipped with two (2) cyclone/baghouse systems for particulate control, and exhausting to two (2) stacks, identified as D-142 .
- (b) The Kustom Woodworking consists of the following facilities:
- (1) Nine (9) spray booths, identified as EU1, using air-assisted airless equipment, each with a maximum capacity of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters and each exhausting to one (1) stack identified as S-1 through S-9, respectively.

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

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

### **Insignificant Activities [326 IAC 6-2-4][326 IAC 6-4] [326 IAC 6-3]**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired boiler, constructed in 1988, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in Building 14 [326 IAC 6-2-4].
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Other categories of facilities with emissions below insignificant thresholds
  - (1) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC.
  - (2) Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings [326 IAC 6-3].

### **Existing Approvals**

The source has constructed or has been operating under the following previous approvals:

Fairmont Homes, Inc

- (a) CP 039-4626-00334, issued on May 30, 1996;
- (b) AA 039-6175-00334, issued on July 18, 1996;
- (c) AA 039-8279-00334, issued on March 24, 1997;
- (d) CP 039-8218-00334, issued on July 12, 1997; and

Kustom Woodworking

- (e) CP 20-12-91-0676, issued on August 12, 1988; and
- (f) Exemption 039-3391-00219, issued on December 21, 1993.

Entire Source: Both Plants

- (g) OP T039-6992-00509; issued on February 25, 1999.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on May 27, 2003.

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 to 6 Appendix A).

**Unrestricted Potential Emissions**

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

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)
Methyl Ethyl Ketone (MEK)	greater than 10
Methylene Chloride	greater than 10
Vinyl Acetate	less than 10
Ethylene Glycols	less than 10
4-4' Methylene-diphenyl Di-isocyanate (MDI)	less than 10
Methanol	greater than 10
Hexane	less than 10
Xylenes	less than 10
Methyl Chloroform	greater than 10
Diethylene Ether	less than 10
1,2 Epoxybutane	less than 10
TOTAL	greater than 25

- (a) The unrestricted potential emissions of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions 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.

- (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.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
	Fairmont Homes, Inc. and Kustom Woodworking (combined)
PM	no data
PM-10	0.02
SO <sub>2</sub>	0.00
VOC	109.58
CO	0.06
NO <sub>x</sub>	0.31
HAP (specify)	no data

**Potential to Emit After Issuance**

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

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single Worst Case	Combined Total
Woodworking Emissions	10.01	10.01	0.00	0.0	0.00	0.00	0.00	0.00
Fairmont Homes Inc. Surface Coating Emissions	16.71	16.71	0.00	249.0	0.00	0.00	30.00 (Toluene)	50.00
Kustom Woodworking Surface Coating Emissions			0.00	249.0	0.00	0.00	45.00 (Toluene)	70.00
Insignificant Activities	0.16	0.16	0.01	0.1	1.74	2.07	0.04 (Hexane)	0.04
<b>Total Emissions</b>	<b>26.88</b>	<b>26.88</b>	<b>0.01</b>	<b>499.0</b>	<b>1.74</b>	<b>2.07</b>	<b>75.00</b>	<b>120.04</b>

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance, attainment
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 attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Part 70 Permit Conditions

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

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

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are no longer applicable to this source since the source is now subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.800, Subpart JJ) as discussed below.
- (c) The wood surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.800, Subpart JJ), with a compliance date of December 7, 1998 because Fairmont Homes, Inc. and Kustom Woodworking is a major source as defined in 40 CFR Part 63.2. (Note: The compliance date for this existing source is December 7, 1998 because actual HAP emissions for the source were less than 50 tons in 1996).

The surface coating operations at the source shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids;

or

- (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1) pound VHAP per pound solids.
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

The Permittee of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (A) Operator training course.
  - (B) Leak inspection and maintenance plan.
  - (C) Cleaning and washoff solvent accounting system.
  - (D) Chemical composition of cleaning and washoff solvents.
  - (E) Spray booth cleaning.
  - (F) Storage requirements.
  - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
  - (H) Line cleaning.
  - (I) Gun cleaning.
  - (J) Washoff operations.
  - (K) Formulation assessment plan for finishing operations.
- (d) A pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC at this source shall be subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring, if the following three criteria are met:

- (A) the potential to emit before controls equal to or greater than one hundred (100) tons per year of VOC;
- (B) is subject to an emission standard for VOC and has a control device that is necessary to meet that limit; and
- (C) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Each of the nine (9) surface coating spray booths has uncontrolled potential to emit of VOC of greater than 100 tons per year. However, each has no control device to control the emissions of VOC, therefore each of the nine (9) surface spray booths at the source is not subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring.

- (e) One (1) natural gas-fired boiler, identified as Boiler 14, constructed in 1988, and rated at 4.72 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.

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

##### 326 IAC 2-2 (Prevention of Significant Deterioration)

The following facilities were constructed before the applicability date of August 7, 1977:

- (a) Building , constructed in 1971, consisting of one (1) airless vapor barrier system and one (1) flowcoating foam application system as well as seventeen (17) natural gas fired radiant heaters.
- (b) Building 1A, constructed in 1971, housing three (3) natural gas fired radiant heater and woodworking equipment.
- (c) Building 1B, constructed in 1976, housing four (4) natural gas fired radiant heaters and woodworking equipment.
- (d) Building 1C, constructed in 1976, consisting of one (1) flowcoating adhesive application system , eight (8) natural gas fired radiant heaters and woodworking equipment.
- (e) Building 12, constructed in 1976, including one (1) flowcoating foam application system, one (1) airless vapor barrier application system, two(2) natural gas fired radiant heaters, and woodworking equipment.

Facilities were constructed after the applicability date of August 7, 1977 as listed as follows:

- (f) Building 5, constructed in 1979, housing one (1) flowcoating foam application system, one (1) airless vapor barrier application, one (1) natural gas fired boiler and woodworking equipment.
- (g) Building 5A, constructed in 1980, includes one (1) flowcoat adhesive application, four (4) natural gas fired radiant heaters and woodworking equipment.
- (h) Building 7, constructed in 1978, consists of one (1) flowcoating adhesive application system, one (1) airless vapor barrier application system, one (1) natural gas fired boiler and woodworking equipment.
- (i) Building 7A, constructed in 1980, houses one (1) flowcoating adhesive application

system, five (5) natural gas fired radiant heaters and woodworking equipment.

- (j) Building 12A, constructed in 1994, includes one (1) flowcoating adhesive application system, four (4) natural gas fired radiant heaters and woodworking equipment..
- (k) Building 14, constructed in 1988, consists of one (1) airless paint application system, one (1) natural gas fired boiler, and woodworking equipment.
- (l) Building 22, constructed in 1986, includes one (1) High Vapor Low Pressure (HVLV) adhesive application system, seventeen (17) natural gas fired radiant heaters and woodworking equipment.

All the facilities listed in above (a) through (l) were permitted pursuant to CP 039-4626-00334 issued on May 30, 1996. The source was categorized as minor source because no emission from these facilities was greater than the PSD significant levels and the source was not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

A modification to include one (1) frame shop located in a Building 12B, housing twelve (12) metal inert gas (MIG) welding stations and one (1) surface airless spray coating operation was permitted pursuant to CP 039-8218-00334 issued on July 12, 1997. This modification to an existing minor stationary source is not major source because the total emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the source was considered minor at this time.

Kustom Woodworking consisting of nine (9) spray booths was permitted pursuant to CP 20 -12-91-0676, issued on August 12, 1998. Operation permit T039-6992-00509 was issued on February 25, 1999 combining the two plants, i.e Fairmont Homes and Kustom Woodworking. Pursuant to T039-6992-00509, this combined source is a major source. However, due to the fact that Fairmont Homes and Kustom Woodworking have accepted significant threshold limits on their surface coating equipment they have never received a PSD permit.

Pursuant to 326 IAC 2-2, this source is a major stationary source because the potential to emit VOC is greater than 250 tons per year. This source is not 1 of 28 listed sources and there are no major modifications with emission increase greater than PSD significant levels. However, due to the fact that Fairmont Homes and Kustom Woodworking have accepted significant threshold limits on their surface coating and woodworking equipment, the source has never received a PSD permit. The facilities are limited as follows:

- (a) The Fairmont Homes surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period, with compliance determined at the end of each month.
- (b) The Kustom Woodworking surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months period, with compliance determined at the end of each month.

Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

### 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 in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

### 326 IAC 5-1 (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.

## State Rule Applicability - Individual Facilities

### 326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not subject to other provisions of Article 8. This source has wood surface coating operations performed in the spray booths that were constructed after January 1, 1980, with unrestricted potential VOC emissions greater than 25 tons per year. All surface coating operation at this source are wood surface coating operations and are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), therefore, this rule does not apply.

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

This source is subject to 326 IAC 8-2-12 for each of nine (9) spray booths, identified as EU1 because they are constructed after 1990, and each has the potential to emit more than fifteen (15) pounds per day of VOC. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at nine (9) booths shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

This source uses air assisted airless spray application equipment to coat the wood cabinets. Therefore, they are in compliance with this rule.

326 IAC 6-3-2 (Process Operations)

Pursuant to T039-17652-00509, issued on February 25, 1999 and 40 CFR 52, Subpart P, the particulate matter (PM) from the surface coating operations shall be limited by the following:

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

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

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

Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications pursuant to 326 IAC 6-3-2(d).

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to T039-17652-00509, issued on February 25, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from significant woodworking equipment shall be limited as follows:

Building	PM Control Equipment	Process Weight Rate (tons per hour)	Allowable Emission Rate (pounds per hour)
1	Cyclone D-1	0.08	0.77
1A	Baghouse/Cyclone	10.35	19.62
5	Cyclone D-53	0.05	0.551 <sup>#</sup>
5A/7A	no control	0.33	1.96
12	Cyclone D-3	0.07	0.67
14	Cyclone D-141	0.05	0.57
22	Cyclone/Baghouse	1.63	5.68
22	Cyclone/Baghouse	0.42	2.29

<sup>#</sup> 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) was not intended to limit processes with throughputs below 100 pounds per hour to less than 0.551 pounds per hour. Therefore, this limit will be adjusted to 0.551 pounds per hour.

These limits were calculated using the following equation:

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

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

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

The cyclones and baghouse shall be in operation at all times the associated woodworking equipment are in operation, in order to comply with this limit.

(b) Pursuant to T039-17652-00509, issued on February 25, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant woodworking with or without control equipment, exhausting inside the buildings shall be limited the following:

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

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

Pursuant to 326 IAC 6-3-2(d)(2), the allowable emissions from insignificant woodworking with a total process weight rate less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

#### 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating) the PM emissions from Boiler 14, constructed in 1988, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on lower of the emissions limit calculated by the following equation and 0.6 pounds per MMBtu:

$$P_t = \frac{1.09}{Q^{0.26}} = \frac{1.09}{4.72^{0.26}} = 0.73 \text{ lb/MMBtu}$$

Where  $P_t$  = Pounds of particulate matter emitted per million Btu(lb/MMBtu) heat input  
 $Q$  = Total source maximum operating capacity rating in million Btu per hour (MM Btu/hr) heat input.

Therefore, the PM emissions from the boiler are limited to 0.6 lb/MMBtu. Based on the calculations in Appendix 5 of 5, the source will be in compliance with the requirements of 326 IAC 6-2-4.

### Testing Requirements

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAP limit specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The surface coating booths have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and vents while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

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

contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (f) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (g) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
  - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (h) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
- (i) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of

the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the baghouse and the cyclones for all the woodworking shops must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 5-1 (Opacity) and 326 IAC 2-7 (Part 70).

### **Conclusion**

The operation of this framed home manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-17652-00509**.

**Company Name:** Fairmont Homes Inc. and Kustom Woodworking  
**Address City IN Zip:** 502 South Oakland Avenue, Nappanee, Indiana 46550; and  
 625 South Oakland Avenue, Nappanee, Indiana 46550.  
**Permit Number:** T039-17652-00509  
**Plt ID:** 039-00509  
**Reviewer:** FO/EVP  
**Date:** 9/11/2003

Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
0.00280	9.41	3,698	99.90%	3657.98
<b>Total Emissions (Based on Rated Capacity at 8,760 hr/yr and source controls) =</b>				<b>3657.98</b>
<b>Controlled Emission</b>				<b>3.66</b>

**Allowable Emissions from Woodworking**

Woodworking throughput (tons/hr): (lbs wood/hr)(ton/2000lb) = 0.418

326 IAC 6-3-2 (Process Operations - Particulate Emissions Limitations)

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

where E = Emissions in lbs/hr

P = Process weight rate in tons/hr

$$E = 2.29 \text{ lbs/hr}$$

$$E = 10.01 \text{ tons/yr}$$

Methodology:

State Potential (uncontrolled):

Woodworking Process (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft²) \* Filter Area (ft²) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

**PM is assumed equal to PM-10**

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

**Company Name: Fairmont Homes Inc. and Kustom Woodworking  
Address City IN Zip: 502 South Oakland Avenue, Nappanee, Indiana 46550; and  
625 South Oakland Avenue, Nappanee, Indiana 46550.  
Permit Number: T039-17652-00509  
Plt ID: 039-00509  
Permit Reviewer: FO/EVP  
Date: 09/09/2003**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit*)	Maximum (unit*/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Methyl Ethyl Ketone	Weight % Methyl Alcohol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)
Bernyl Deluxe 25	8.05	0.00315	3840	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Catalyst 329	6.90	0.00250	3840	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Thinner 419	7.69	0.00250	3840	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Bernyl unisurface	10.78	0.00250	3840	7.00%	0.00%	0.00%	0.00%	0.00%	31.73	0.00	0.00	0.00	0.00
Careseal HS	8.14	0.00315	3840	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Hi-Ridge Stain	6.66	0.00250	2560	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Thinner/Cleanup	7.01	0.00250	6400	0.00%	60.00%	10.00%	10.00%	10.00%	0.00	294.76	49.13	49.13	49.13

**Total Single HAP Potential Emissions**

**31.73      294.76      49.13      49.13      49.13**

**Total Combined HAPs Emissions**

**473.86**

**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

**\*1 unit = 1 square foot**

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

**Company Name: Fairmont Homes, Inc. and Kustom Woodworking  
Address City IN Zip: 502 South Oakland Avenue, Nappanee, Indiana 46550; and  
625 South Oakland Avenue, Nappanee, Indiana 46550.  
Permit Number: T039-17652-00509  
Pit ID: 039-00509  
Reviewer: FO/EVP  
Date: 09/09/2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit*)	Maximum (unit*/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Bernyl Deluxe 25	8.05	55.97%	0.0%	55.97%	0.0%	36.00%	0.00315	3840.000	4.51	4.51	54.50	1307.99	238.71	93.89	12.52	50%
Catalyst 329	6.90	92.41%	0.0%	92.41%	0.0%	4.60%	0.00250	3840.000	6.38	6.38	61.21	1469.10	268.11	11.01	138.62	50%
Thinner 419	7.69	100.00%	0.0%	100.00%	0.0%	0.00%	0.00250	3840.000	7.69	7.69	73.82	1771.78	323.35	0.00	#DIV/0!	100%
Bernyl unisurfacer	10.78	35.00%	0.0%	35.00%	0.0%	47.00%	0.00250	3840.000	3.77	3.77	36.22	869.30	158.65	147.32	8.03	50%
Careseal HS	8.14	63.10%	0.0%	63.10%	0.0%	30.00%	0.00315	3840.000	5.14	5.14	62.13	1491.10	272.13	79.57	17.12	50%
Hi-Ridge Stain	6.66	97.34%	0.0%	97.34%	0.0%	3.00%	0.00250	2560.000	6.49	6.49	41.52	996.36	181.84	2.48	216.22	50%
Thinner/Cleanup	7.01	100.00%	0.0%	100.00%	0.0%	0.00%	0.00250	6400.000	7.01	7.01	112.16	2691.84	491.26	0.00	#DIV/0!	100%

**Total Uncontrolled Potential Emissions (Uncontrolled)  
Controlled Emissions**

**441.56      10597.46      1934.04      334.27  
16.71**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

\*1 unit = 1 square foot

**Appendix A: Summary of Emission Calculations**

**Company Name:** Fairmont Homes Inc. and Kustom Woodworking  
**Address City IN Zip:** 502 South Oakland Avenue, Nappanee, Indiana 46550; and  
 625 South Oakland Avenue, Nappanee, Indiana 46550.  
**Permit Number:** T039-17652-00509  
**Plt ID:** 039-00509  
**Reviewer:** FO/EVP  
**Date:** 09/11/2003

<b>Uncontrolled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Woodworking Process Emission	Natural Gas Combustion	TOTAL
PM	334.27	3,657.98	0.16	3,992.4
PM10	334.27	3,657.98	0.16	3,992.4
SO2	0.00	0.00	0.01	0.0
NOx	0.00	0.00	2.07	2.1
VOC	1,934.04	0.00	0.11	1,934.2
CO	0.00	0.00	1.74	1.7
total HAPs	473.86	0.00	0.04	473.9
worst case single HAP	294.76	0.00	0.04	294.8
Total emissions based on rated capacity at 8,760 hours/year.				
<b>Controlled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Woodworking Process Emission	Natural Gas Combustion	TOTAL
PM	16.71	3.66	0.16	20.5
PM10	16.71	3.66	0.16	20.5
SO2	0.00	0.00	0.01	0.0
NOx	0.00	0.00	2.07	2.1
VOC	1,934.04	0.00	0.11	1,934.2
CO	0.00	0.00	1.74	1.7
total HAPs	473.86	0.00	0.04	473.9
worst case single HAP	294.76	0.00	0.04	294.8
Total emissions based on rated capacity at 8,760 hours/year, after control.				

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: Fairmont Homes, Inc. and Kustom Woodworking**  
**Address City IN Zip: 502 South Oakland Avenue, Nappanee, Indiana 46550; and**  
**625 South Oakland Avenue, Nappanee, Indiana 46550**  
**Permit Number: T039-17652-00509**  
**Pit ID: 039-00509**  
**Reviewer: FO/EVP**  
**Date: 09/11/2003**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.7

41.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.2	0.0	2.1	0.1	1.7

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00004	0.00002	0.00155	0.03721	0.00007

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.00001	0.00002	0.00003	0.00001	0.00004

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.