



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 2, 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: Four Seasons Housing, Inc. / 039-17852-00458

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 9/16/03



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

**Four Seasons Housing, Inc.
11333 County Road 2
Middlebury, Indiana 46540**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 039-17852-00458	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 2, 2004 Expiration Date: July 2, 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

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

Authorized individual:	CEO
Source Address:	11333 County Road 2, Middlebury, Indiana 46540
Mailing Address:	P.O. Box 630, Middlebury, Indiana 46540
General Source Phone:	(574) 825-9999
SIC Code:	3792
Source Location Status:	Elkhart
	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) cabinet assembly area, constructed in 1997, consisting of adhesive application operations on wood and particle board substrates, woodworking operations including radial arm saws, bench saws, drill presses, chop saws, table saws, routers and a notcher, and an interior wall assembly area, equipped with a cyclone and baghouse for air pollution control and exhausting through stack R1, capacity: 4.0 modular homes per hour.
- (b) One (1) roof assembly area, constructed in 1997, consisting of adhesive and foam application operations on wood and plastic substrates using caulking and brush coating, capacity: 4.0 modular homes per hour.
- (c) One (1) dry wall housing coating facility equipped with roll coaters, maximum capacity: 136.12 pounds of coating per hour.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including:
 - (1) One (1) air makeup unit, capacity: 3.9 million British thermal units per hour.
 - (2) Four (4) space heaters, constructed in 1997, fired by natural gas, capacity: 2.50 million British thermal units per hour, each.

- (b) Other categories with emissions below insignificant thresholds:
 - (1) Welding operations with PM₁₀ emissions less than twenty-five (25) pounds per day and using less than six hundred twenty-five (625) pounds of wire or rod per day.
 - (2) Flame cutting operations with PM₁₀ emissions less than twenty-five (25) pounds per day and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less.

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

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

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall-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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Northern Regional Office: 574-245-4870, Facsimile Number: 574-245-4877

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

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

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for

which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2] [IC13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.9 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee 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.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [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 Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 is 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 time frame 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response 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 an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) 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 response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (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 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) cabinet assembly area, constructed in 1997, consisting of adhesive application operations on wood and particle board substrates, woodworking operations including radial arm saws, bench saws, drill presses, chop saws, table saws, routers and a notcher, and an interior wall assembly area, equipped with a cyclone and baghouse for air pollution control and exhausting through stack R1, capacity: 4.0 modular homes per hour.
- (b) One (1) roof assembly area, constructed in 1997, consisting of adhesive and foam application operations on wood and plastic substrates using caulking and brush coating, capacity: 4.0 modular homes per hour.
- (c) One (1) dry wall housing coating facility equipped with roll coaters, maximum capacity: 136.12 pounds of coating per hour.

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

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

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

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

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements) and F039-8569-00458, issued on February 3, 1999, the Best Available Control Technology (BACT) for the one (1) cabinet assembly area and one (1) roof assembly area when coating materials other than wood cabinets is as follows:

- (a) the use of existing low VOC adhesives in the roof assembly operation, which shall be limited to no more than thirty percent (30%) VOC by weight,
- (b) the use of dispensing containers and closed containers for solvents and solvent rags, respectively, and

- (c) the use of no more than 98 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months.

D.1.3 FESOP Limit and Nonattainment New Source Review Minor Limit [326 IAC 2-8] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, FESOP, and F039-8569-00458, issued on February 3, 1999, the source is subject to the following limitation to make 326 IAC 2-7, Part 70, not applicable:

- (a) The VOC usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC to no more than 98.0 tons per year from those operations and less than 100 tons per year from the entire source. Compliance with this limit also makes Nonattainment NSR not applicable.
- (b) The total HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 23.0 tons per year from those operations and less than 25 tons per year from the entire source.
- (c) The individual HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 9.88 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 9.88 tons per year from those operations and less than 10 tons per year from the entire source. This also makes the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, and 40 CFR 63, Subparts JJ, PPPP and QQQQ not applicable.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and F039-8569-00458, issued on February 3, 1999, the particulate from the woodworking operations shall not exceed 12.1 pounds per hour when operating at a process weight rate of 10,049 pounds per hour.

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

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 and D.1.3 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Particulate Control

Pursuant to F039-8569-00458, issued on February 3, 1999, the cyclone and baghouse for particulate control shall be in operation and control emissions from the woodworking operations at the cabinet assembly area at all times that the woodworking is in operation.

D.1.8 Visible Emissions Notations

- (a) Daily visible emission notations of the cabinet assembly area stack (R1) 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.

D.1.9 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 indoors. All defective bags shall be replaced.

D.1.10 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.1.11 Cyclone Inspections

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.1.12 Cyclone Failure Detection

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 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2(a) and (c) and D.1.3(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits, the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2(a) and (c) and D.1.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water 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;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Conditions D.1.3(b) and (c), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and/or the HAPs emission limits established in Conditions D.1.3(b) and (c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The individual HAP and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water 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 total individual HAP and total HAPs usage for each month; and
 - (4) The weight each individual HAP and total HAPs emitted for each compliance period.
- (a) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the cabinet assembly area stack (R1) exhaust.
- (b) To document compliance with Conditions D.1.9 and D.1.11, the Permittee shall maintain records of the results of the inspections required Conditions D.1.9 and D.1.11 and the dates the vents are redirected.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including:
 - (1) One (1) air makeup unit, capacity: 3.9 million British thermal units per hour.
 - (2) Four (4) space heaters, constructed in 1997, fired by natural gas, capacity: 2.50 million British thermal units per hour, each.
- (b) Other categories with emissions below insignificant thresholds:
 - (1) Welding operations with PM₁₀ emissions less than twenty-five (25) pounds per day and using less than six hundred twenty-five (625) pounds of wire or rod per day.
 - (2) Flame cutting operations with PM₁₀ emissions less than twenty-five (25) pounds per day and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less.

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

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

D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to F039-8569-00458, issued on February 3, 1999, and 40 CFR 52 Subpart P, the allowable PM emission rate from the welding and flame cutting operations 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:

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

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

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

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458

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:

Date:

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

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

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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• 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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458
Facility: Roof assembly area, cabinet assembly area and dry wall housing coating facility
Parameter: VOC usage
Limit: No more than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458
Facility: Roof assembly area, cabinet assembly area and dry wall housing coating facility
Parameter: Individual HAP usage
Limit: No more than 9.88 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage	Individual HAP Usage	Individual HAP Usage
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458
Facility: Roof assembly area, cabinet assembly area and dry wall housing coating facility
Parameter: Total HAPs usage
Limit: No more than 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAPs Usage	Total HAPs Usage	Total HAPs Usage
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Four Seasons Housing, Inc.
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
FESOP No.: 039-17852-00458

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

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

Source Background and Description

Source Name:	Four Seasons Housing, Inc.
Source Location:	11333 County Road 2, Middlebury, Indiana 46540
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	039-8569-00458
Operation Permit Issuance Date:	February 3, 1999
Permit Renewal No.:	039-17852-00458
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Four Seasons Housing, Inc. relating to the operation of a modular home manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) cabinet assembly area, constructed in 1997, consisting of adhesive application operations on wood and particle board substrates, woodworking operations including radial arm saws, bench saws, drill presses, chop saws, table saws, routers and a notcher, and an interior wall assembly area, equipped with a cyclone and baghouse for air pollution control and exhausting through stack R1, capacity: 4.0 modular homes per hour.
- (b) One (1) roof assembly area, constructed in 1997, consisting of adhesive and foam application operations on wood and plastic substrates using caulking and brush coating, capacity: 4.0 modular homes per hour.
- (c) One (1) dry wall housing coating facility equipped with roll coaters, maximum capacity: 136.12 pounds of coating per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units proposed during this review process.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including:

- (1) One (1) air makeup unit, capacity: 3.9 million British thermal units per hour.
 - (2) Four (4) space heaters, constructed in 1997, fired by natural gas, capacity: 2.50 million British thermal units per hour, each.
- (b) Other categories with emissions below insignificant thresholds:
- (1) Welding operations with PM₁₀ emissions less than twenty-five (25) pounds per day and using less than six hundred twenty-five (625) pounds of wire or rod per day.
 - (2) Flame cutting operations with PM₁₀ emissions less than twenty-five (25) pounds per day and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less.

Existing Approvals

The source has been operating under the previous FESOP 039-8569-00458 issued on February 3, 1999, with an expiration date of February 3, 2004, and the following amendments and revisions:

- (a) Administrative Amendment 039-12196 issued on July 10, 2000
- (b) Re-Opening 039-13031 issued on September 24, 2001
- (c) Administrative Amendment 039-14685 issued on August 27, 2001

The following condition has been revised in this FESOP Renewal:

Condition D.1.4(c) of FESOP 039-8569-00458 issued on February 3, 1999, "These facilities shall use no more than 9.9 tons of each individual HAP, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive months from the entire source."

This condition was revised because the insignificant combustion activities have the potential to emit 0.110 tons per year of Hexane. In the case Hexane is emitted from the roof assembly, cabinet assembly and dry wall housing coating facilities, the Hexane from those facilities must be limited to no more than 9.88 tons per year in order to ensure that the potential to emit any individual HAP is less than 10 tons per year. Therefore, the condition is revised to limit the individual HAP usage from the facilities in Section D.1 of the permit to 9.88 tons per twelve (12) consecutive month period rather than 9.9 tons per twelve (12) consecutive month period.

All other conditions from previous approvals were incorporated into this FESOP except the following:

Condition C.15 of FESOP 039-8569-00458 issued on February 3, 1999, Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

Reason not incorporated: Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement (see 326 IAC 2-6 in the State Rule Applicability - Entire Source section of this document).

Enforcement Issue

The source has the following enforcement action pending:

Notice of Violation, Case No. 2003-13190-A, Signed by IDEM on March 2, 2004:

Four Seasons Housing, Inc. failed to submit a FESOP Renewal application to IDEM at least nine (9) months prior to February 3, 2004, the expiration date of the existing FESOP, F 039-8569-00458.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on August 18, 2003.

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

Emission Calculations

See pages 1 through 5 of Appendix A of this document for detailed emission calculations for surface coating and insignificant activities. Particulate emissions from woodworking were summarized in the TSD to F039-8569-00458, issued on February 3, 1999, and are as follows:

Particulate emissions from the woodworking operations in the cabinet assembly area were based upon measurements taken at an identical Four Seasons Housing plant, and have been adjusted from a maximum capacity of 3.0 homes per hour to 4.0 homes per hour. All woodworking devices are connected to the baghouse/cyclone dust collector.

5.3 tons (10,600 lb) of sawdust are collected annually in the cyclone.

System operates at approximately 23.3% capacity (40 hour work week, 51 weeks)

Cyclone is 99% efficient

$(10,600 \text{ lb/yr} / 2,040 \text{ hrs/yr}) \times 4/3$	= 6.93 lbs/hr collected dust adjusted for capacity
$6.93 \text{ lb/yr} / 0.99$	= 7.00 lbs/hr uncontrolled Potential Emissions
$PM = PM_{10}$	= 30.7 TPY uncontrolled Potential Emission
$7.00 \text{ lbs/hr} (1 - .99)$	= 0.070 lb/hr Potential Emissions after control
	= 0.307 TPY Potential Emissions after control

	Recap of Emissions in Tons Per Year				
	Adhesive, Coating & Foam Application	Woodworking	Welding and Flame Cutting	Combustion	Total
PM	0.000	30.7	0.084	0.116	30.9
PM₁₀	0.000	30.7	0.084	0.463	31.2
SO₂	0.000	0.000	0.000	0.037	0.037
NO_x	0.000	0.000	0.000	6.09	6.09
VOC	245	0.000	0.000	0.335	245
CO	0.000	0.000	0.000	5.11	5.11

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	30.9
PM ₁₀	31.2
SO ₂	0.037
VOC	245
CO	5.11
NO _x	6.09

HAPs	Unrestricted Potential Emissions (tons/yr)
Toluene	8.07
Hexane	8.15
MEK	40.7
Ethylene Glycol	5.73
MDI	0.0003
Benzene	0.0001

HAPs	Unrestricted Potential Emissions (tons/yr)
Dichlorobenzene	0.0001
Formaldehyde	0.005
Lead	0.0003
Cadmium	0.0001
Chromium	0.0002
Manganese	0.002
Nickel	0.0001
Total	64.7

- (a) The unrestricted potential emissions of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Cabinet assembly, Roof assembly, and Dry wall housing coating	30.7	30.7	-	98.0	-	-	9.88 individual 23.0 total
Insignificant Activities	0.200	0.547	0.037	0.335	5.11	6.09	0.117
Total Emissions	30.9	31.2	0.037	< 100	5.11	6.09	< 10 individual < 25 total

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	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. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

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) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, Subpart JJ (Part 63.800) because the source is not a major source of HAPs.

- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP (Part 63.4480) because the source is not a major source of HAPs.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products, Subpart QQQQ (Part 63.4680) because the source is not a major source of HAPs.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.
- (f) This source does not require a Part 70 Operating Permit. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

- (a) This source was constructed after August 7, 1977 and is not one of the twenty-eight (28) listed source categories. The unrestricted potential PM, PM₁₀, VOC, CO, NO_x, SO₂, and CO emissions were less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 were not applicable.
- (b) The unrestricted potential PM, PM₁₀, VOC, CO, NO_x, SO₂, and CO emissions from all modifications to this source were less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 were not applicable.
- (c) The unrestricted potential PM, PM₁₀, VOC, CO, NO_x, SO₂, and CO emissions are still less than 250 tons per year. Therefore, this source is still a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with potential to emit greater than twenty-five (25) tons per year (tpy) of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

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

The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4 and F039-8569-00458, issued on February 3, 1999, the source is subject to the following limitation to make 326 IAC 2-7, Part 70, not applicable:

- (a) The VOC usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC to no more than 98.0 tons per year from those operations and

less than 100 tons per year ($98.0 + 0.335$ (from insignificant combustion) < 100) from the entire source.

- (b) The total HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 23.0 tons per year from those operations and less than 25 tons per year ($23.0 + 0.115$ (from combustion) $+ 0.0023$ (from welding and flame cutting) < 25) from the entire source.
- (c) The individual HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 9.88 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 9.88 tons per year from those operations and less than 10 tons per year ($9.88 + 0.110$ (worst case HAP is Hexane from combustion) < 10) from the entire source.

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 the 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.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to F039-8569-00458, issued on February 3, 1999, the particulate from the woodworking operations shall not exceed 12.1 pounds per hour when operating at a process weight rate of 10,049 pounds per hour. Since this PM emission rate of 12.1 pounds per hour is greater than the potential PM emission rate of 7.00 pounds per hour, the woodworking operations comply with this rule. This limitation is based upon the following:

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

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

- (b) The adhesive and foam application operations at this source use brush coating and caulking and have the potential particulate emissions less than 0.551 pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(8) and (14), the requirements of 326 IAC 6-3-2 are not applicable.

- (c) The dry wall coating operations at this source use roll coating application methods. Therefore, pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3-2 are not applicable.
- (d) The insignificant welding operations use less than six hundred twenty-five (625) pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). However, the welding operations are still subject to 326 IAC 6-3-2 (Process Operations) under 40 CFR Part 52, Subpart P (see 326 IAC 6-3-2 (Process Operations), below).
- (e) The insignificant torch cutting operations cut less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less. Therefore, pursuant to 326 IAC 6-3-1(b)(10), the flame cutting operations are exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). However, the torch cutting operations are still subject to 326 IAC 6-3-2 (Process Operations) under 40 CFR Part 52, Subpart P (see 326 IAC 6-3-2 (Process Operations), below).

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Condition D.2.1 of FESOP 039-8569-00458 issued on February 3, 1999:

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the welding and flame cutting operations shall not exceed allowable PM emission rate based on 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:

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

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

- (a) Adhesive and foam is applied to wood and plastic substrates, not all of which are wood cabinets, at the roof assembly and cabinet assembly areas, which have the potential to emit more than 25 tons per year of VOC when coating materials other than wood cabinets. Therefore, 326 IAC 8-1-6 is applicable. Pursuant to F039-8569-00458, issued on February 3, 1999, the Best Available Control Technology (BACT) for these operations, when coating materials other than wood cabinets, is as follows:
 - (1) the use of existing low VOC adhesives in the roof assembly operation, which shall be limited to no more than thirty percent (30%) VOC by weight,

- (2) the use of dispensing containers and closed containers for solvents and solvent rags, respectively, and
 - (3) the use of no more than 98 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months.
- (b) The potential VOC emissions from the dry wall housing coating facility are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to the dry wall housing coating facility.

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

- (a) Since the adhesive and foam application operations on wood substrates were constructed after 1990 and the actual VOC emissions from each facility is greater than 15 pounds per day, the adhesive and foam application are subject to the requirements of 326 IAC 8-2-12 when coating wood cabinets. This rule requires that the Permittee apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repairs, using one (1) or more of the following application systems:

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)	Aerosol Spray Cans

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a 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.

- (b) The caulking and brush-on adhesive applications methods used at the source are in compliance with this rule.

Testing Requirements

There is still no testing required for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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:

The woodworking operations at the cabinet assembly area have applicable compliance monitoring conditions as specified below:

- (a) Pursuant to F039-8569-00458, issued on February 3, 1999, the cyclone and baghouse for particulate control shall be in operation and control emissions from the woodworking operations at the cabinet assembly area at all times that the woodworking is in operation.
- (b) Daily visible emission notations of the cabinet assembly area stack (R1) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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) An inspection shall be performed each calendar quarter of all bags controlling the wood-working 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 indoors. All defective bags shall be replaced.
- (d) 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).
- (e) 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.
- (f) 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.
- (g) Additional monitoring as prescribed by the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cyclone and baghouse for the wood-working operations at the cabinet assembly area must operate properly to ensure compliance with 326 IAC 2-8, FESOP.

Conclusion

The operation of this modular home manufacturing source shall be subject to the conditions of the FESOP 039-17852-00458.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Four Seasons Housing, Inc.
Source Location: 11333 County Road 2, Middlebury, Indiana 46540
County: Elkhart
FESOP: F 039-17852-00458
SIC Code: 3792
Permit Reviewer: CarrieAnn Paukowits

On May 28, 2004, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Four Seasons Housing, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to continue to operate a modular home manufacturing source with a cyclone and baghouse as controls. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition B.22 has been revised to include the correct name of the billing section, as follows:

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, ~~IM~~ & Billing, **Licensing, and Training** Section), to determine the appropriate permit fee.

Change 2:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named twenty-three (23) Indiana counties and one partial county nonattainment for the new eight-hour ozone standard. The designations became effective on June 15, 2004. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Section A.1, General Information, and Condition D.1.3 have been revised as follows:

A.1 General Information [326 IAC 2-8-3(b)]

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

Authorized individual: CEO
Source Address: 11333 County Road 2, Middlebury, Indiana 46540
Mailing Address: P.O. Box 630, Middlebury, Indiana 46540
General Source Phone: (574) 825-9999
SIC Code: 3792
Source Location Status: Elkhart

Nonattainment for ozone under the 8-hour standard
Attainment for all **other** criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

D.1.3 FESOP Limit and Nonattainment New Source Review Minor Limit [326 IAC 2-8] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, FESOP, and F039-8569-00458, issued on February 3, 1999, the source is subject to the following limitation to make 326 IAC 2-7, Part 70, not applicable:

- (a) The VOC usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC to no more than 98.0 tons per year from those operations and less than 100 tons per year from the entire source. **Compliance with this limit also makes Nonattainment NSR not applicable.**
- (b) The total HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 23.0 tons per year from those operations and less than 25 tons per year from the entire source.
- (c) The individual HAP usage at the roof assembly area, cabinet assembly area, and the dry wall housing coating facility is limited to no more than 9.88 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than 9.88 tons per year from those operations and less than 10 tons per year from the entire source. This also makes the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, and 40 CFR 63, Subparts JJ, PPPP and QQQQ not applicable.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remained unchanged.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
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. See the State Rule Applicability for the source section.~~
- (a) **Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.**
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

HAP Emission Calculations

Company Name: Four Seasons Housing, Inc.
Address City IN Zip: 11333 County Road 2, Middlebury, Indiana 46540
FESOP Renewal: 039-17852
Plt ID: 039-00458
Reviewer: CarrieAnn Paukowits
Date: August 18, 2003

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Emission Factor	Weight % Toluene	Weight % Hexane	Weight % MEK	Weight % Ethylene Glycol	Weight % MDI	Weight % Glycol Ethers	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	MEK Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	MDI Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Cabinet Assembly																
Conbond	6.70	0.3030	4.00	1.00	20.00%	22.60%	0.10%	0.00%	0.00%	0.00%	7.11	8.04	0.04	0.00	0.00	0.00
Sun Adhesive	9.90	0.1102	4.00	1.00	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.96	0.00	0.00	0.00	0.00	0.00
Latex Adhesive	10.10	0.6481	4.00	1.00	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	0.00	5.73	0.00	0.00
Weldon	7.22	0.3030	4.00	1.00	0.00%	0.00%	80.00%	0.00%	0.00%	0.00%	0.00	0.00	30.66	0.00	0.00	0.00
Harvey Seal	11.32	0.0379	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Roof Assembly																
Shingle Stick	7.74	0.2192	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Plastic Cement	7.74	0.1515	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Lap Cement	7.74	3.0303	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Oatley Cleaner	6.60	0.0909	4.00	1.00	0.00%	0.00%	95.00%	0.00%	0.00%	0.00%	0.00	0.00	9.99	0.00	0.00	0.00
Foam Seal	10.29	6.0606	4.00	6.0E-07	0.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00	0.00	0.00	0.00	0.0003	0.00
Foam Seal Solvent	8.00	0.0250	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	60.00%	0.00	0.00	0.00	0.00	0.00	2.10

Total State Potential Emissions

TOTALS:	(tons/yr):	8.07	8.04	40.7	5.73	0.0003	2.10
	(lb/hr):	1.84	1.84	9.30	1.31	0.0001	0.480
	(g/sec):	0.232	0.231	1.17	0.165	0.00001	0.061

Total HAPS = 64.6 TPY

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
 MDI Emission Factor derived using methodology from The Society of the Plastics Industry, Publication AX-186

**Appendix A: Emissions Calculations
From Welding and Flame Cutting Operations**

Company Name: Four Seasons Housing, Inc.
Address City IN Zip: 11333 County Road 2, Middlebury, Indiana 46540
FESOP Renewal: 039-17852
Plt ID: 039-00458
Reviewer: CarrieAnn Paukowits
Date: August 18, 2003

Type of Welding	Number of Units	Electrode Type	Maximum Electrode Consumption per Unit (lbs/hr)	Emission Factors (lb pollutant/lb electrode consumed)		Potential Emissions (tons/year)	
				PM	Manganese	PM	Manganese
Stick Welding	1.0	Carbon Steel	0.12500	0.0370	0.0030	0.020	0.002
Total Potential Emissions (tons/yr):						0.020	0.002

METHODOLOGY

Emissions (tons/yr) = Number of Units * Maximum Electrode Consumption per Unit * Emission Factor (lb pollutant/lb electrode consumed) * 8760 (hrs/yr) * (1 ton/2000 lbs)
Emission Factors are from the SARA 313 Reporting Guide.

Type of Flame-Cutting	Maximum Metal Thickness Cut (inches)	Maximum Metal Cutting Rate (in/min)	Emission Factors (lbs pollutant/1000 inches cut 1" thick)				Potential Emissions (tons/year)			
			PM	Manganese	Nickel	Chromium	PM	Manganese	Nickel	Chromium
Oxyacetylene	0.25	6.0	0.1622	0.0005	0.0001	0.0003	0.0639	0.0002	0.00004	0.0001
Total Potential Emissions (tons/yr):						0.064	0.0002	0.00004	0.0001	

METHODOLOGY

Emissions (tons/yr) = Maximum Metal Thickness Cut (in) * Emission Factor (lbs pollutant/1000 inches cut 1" thick) * Maximum Metal Cutting Rate (in/min) * 60 (min/hr) * 8760 (hrs/yr) * (1 ton/2000 lbs)
Emission Factors are from the SARA 313 Reporting Guide.

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

Company Name: Four Seasons Housing, Inc.
Address City IN Zip: 11333 County Road 2, Middlebury, Indiana 46540
FESOP Renewal: 039-17852
Pit ID: 039-00458
Reviewer: CarrieAnn Paukowits
Date: August 18, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.90

122

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.116	0.463	0.037	6.09	0.335	5.11

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 5 for HAPs emissions calculations.

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

Company Name: Four Seasons Housing, Inc.
Address City IN Zip: 11333 County Road 2, Middlebury, Indiana 46540
FESOP Renewal: 039-17852
Pit ID: 039-00458
Reviewer: CarrieAnn Paukowits
Date: August 18, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr	0.0001	0.0001	0.005	0.110	0.0002

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total
Potential Emission in tons/yr	0.00003	0.0001	0.0001	0.00002	0.0001	0.115

Methodology is the same as page 4.

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