



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 22, 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: Lincoln Park Homes / 087-18373-00024

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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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Lincoln Park Homes, a Division of Patriot Homes, Inc.
3195 State Road 5 North
Shipshewana, Indiana 46565-0610**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 087-18373-00024	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 22, 2004 Expiration Date: June 22, 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary manufactured homes assembly plant producing manufactured homes.

Authorized Individual: President, Patriot Manufacturing
Source Address: 3195 State Road 5 North, Shipshewana, Indiana 46565-0610
Mailing Address: 307 South Main Street, Suite 200, Elkhart, Indiana 46516
General Source Phone: (574) 524-8600
SIC Code: 2451
County Location: LaGrange
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Miscellaneous volatile organic compound (VOC) containing adhesives, coatings, cements, and cleaning solvents. . Adhesive, coatings and cement are used for various applications during woodworking operation and applied by squeezing out of tubes, like caulk, or brushed on. These activities go on throughout the entire plant during the production of the house;
- (b) Eight (8) circular saws, one (1) band saw, twelve (12) air drills, one (1) drywall slitter, one (1) belt sander, eleven (11) routers, one (1) style drill, one (1) floor grinder, twelve (12) mitre saws, eight (8) drills, two (2) radial arm saws, seven (7) hognose saws, seven (7) air routers, and one (1) drill press.
- (c) Two(2) radial arm saws and one (1) table saw, all controlled by one (1) bag type dust collection system, all exhausting at one (1) stack;
- (d) Five (5) natural gas fired forced air furnaces, each rated at 0.4 million (MM) Btu/hr, each exhausting at one (1) stack; and
- (e) One (1) natural gas fired forced air furnace, rated at 0.08 MMBtu/hr exhausting at one (1) stack.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

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

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's 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 PMP 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

C.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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 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

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.9 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) 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.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

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

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

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) Miscellaneous volatile organic compound (VOC) containing adhesives, coatings, cements, and cleaning solvents. Adhesive, coatings, cement and cleaning solvents are used for various applications during woodworking operations and applied by squeezing out of tubes, like caulk, or brushed on. These activities go on throughout the entire plant during the production of the house;
- (b) Eight (8) circular saws, one (1) band saw, twelve (12) air drills, one (1) drywall splitter, one (1) belt sander, eleven (11) routers, one (1) style drill, one (1) floor grinder, twelve (12) mitre saws, eight (8) drills, two (2) radial arm saws, seven (7) hognose saws, seven (7) air routers, and one (1) drill press.
- (c) Two (2) radial arm saws and one (1) table saw, all controlled by one (1) bag type dust collection system, all exhausting at one (1) stack;
- (d) Five (5) natural gas fired forced air furnaces, each rated at 0.4 million (MM) Btu/hr, each exhausting at one (1) stack; and
- (e) One (1) natural gas fired forced air furnace, rated at 0.08 MMBtu/hr exhausting at one (1) stack.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the woodworking operation from the two (2) radial arm saws and one (1) table saw shall not exceed 1.40 pounds per hour, when operating at a process weight rate of 401.03 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:

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

D.1.3 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The input of VOC for the operations coating plastic, ceramic, formica, gypsum, sheetrock, foam, vinyl and roof shingles shall be limited to less than 25 tons on twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Monitoring Requirements

D.1.5 Visible Emissions Notations

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

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain a log of visible emissions notations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Lincoln Park Homes, a Division of Patriot Homes, Inc.
Address:	3195 State Road 5 North
City:	Shipshewana, Indiana
Phone #:	(574) 524-8600
MSOP #:	087-18373-00024

I hereby certify that Lincoln Park Homes, a Division of Patriot Homes, Inc. is still in operation.
 no longer in operation.

I hereby certify that Lincoln Park Homes, a Division of Patriot Homes, Inc. is in compliance with the requirements of MSOP 087-18373-00024.
 not in compliance with the requirements of MSOP 087-18373-00024.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Lincoln Park Homes, a Division of Patriot Homes, Inc.
Source Location:	3195 S.R. 5 North, Shipshewana, Indiana 46565-0610
County:	LaGrange
SIC Code:	2451
Operation Permit No.:	087-18373-00024
Permit Reviewer:	Femi Ogunsola/EVP

The Office of Air Quality (OAQ) has reviewed an application from Lincoln Park Homes, a Division of Patriot Homes, Inc. relating to the construction and operation of manufactured home assembly plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Miscellaneous volatile organic compound (VOC) containing adhesives, coatings, cements, and cleaning solvents. Adhesive, coatings and cement are used for various applications during woodworking operation and applied by squeezing out of tubes, like caulk, or brushed on. These activities go on throughout the entire plant during the production of the house. The entire source operations produce ten (10) units per day (24 hours);
- (b) Eight (8) circular saws, one (1) band saw, twelve (12) air drills, one (1) drywall splitter, one (1) belt sander, eleven (11) routers, one (1) style drill, one (1) floor grinder, twelve (12) mitre saws, eight (8) drills, two (2) radial arm saws, seven (7) hognose saws, seven (7) air routers and one (1) drill press.
- (c) Two(2) radial arm saws and one (1) table saw, all controlled by one (1) bag type dust collection system, all exhausting at one (1) stack;
- (d) Five (5) natural gas fired forced air furnaces, each rated at 0.4 million (MM) Btu/hr, each exhausting at one (1) stack; and
- (e) One (1) natural gas fired forced air furnace, rated at 0.08 MMBtu/hr exhausting at one (1) stack.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) Construction Permit CP 087-4861-00024 issued on 02/12/1996.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on November 14, 2003.

Emission Calculations

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

Potential to Emit (of the Source) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	6.38
PM ₁₀	6.38
SO ₂	0.00
VOC	47.12
CO	0.20
NO _x	0.90

HAPs	Potential to Emit (tons/yr)
MDI	6.17
EthyleneGlycol	0.15
MEK	0.13
Hexane	0.15
Methanol	3.87
Methyl Chloride	0.02
Methyl Chloroform	0.40
Toluene	0.50
1,4 Dioxane	0.24
Vinyl Acetate	0.01
Glycol Ethers	0.12
Total	11.77

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2.6.1.
- (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.

County Attainment Status

The source is located in LaGrange 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. LaGrange 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) LaGrange County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	3.19
PM ₁₀	3.19
SO ₂	0.00
VOC	24.00
CO	0.20
NO _x	0.90
Single HAP (MDI)	6.17
Combination HAPs	11.77

- (a) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories..
- (b) These emissions were based on the MSOP application submitted by the Permittee on November 14, 2003.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 087-18373-00024, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

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 unit is not subject to the requirements of 40 CFR 63, subpart M - National Emission Standards for Hazardous Air Pollutants (NESHAP) : Surface Coating of Miscellaneous Metal Parts and Products, because the potential to emit of any single worst case hazardous air pollutant is less than ten(10) per year and the potential to emit of total combined hazardous air pollutants (HAPs) is less than twenty five (25) tons peryear.
- (c) This source unit is not subject to the requirements of 40 CFR 63, subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) : Wood Furniture Manufacturing Operation, because the potential to emit of any single worst case hazardous air pollutant is less than ten(10) per year and the potential to emit of total combined hazardous air pollutants (HAPs) is less than twenty five (25) tons peryear.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in LaGrange County and the potentials to emit of VOC and PM/PM₁₀ are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

The operation of surface coating facility will emit less than ten (10) tons per year of a single HAP or twenty five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

- (a) Pursuant to CP 087-4861-00024, issued on February 12, 1996, the particulate from the woodworking operations using two (2) radial arm saws and one (1) table saw shall be limited by the following:

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

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

Allowable emissions from woodworking operations:

$$E = 4.10 * 0.20^{0.67} \\ E = 1.40 \text{ lbs/hr}$$

The dust collector shall be in operation at all times the woodworking operations are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-1 (b), woodworking operations from eight (8) circular saws, twelve (12) air drills, one (1) belt sander, eleven (11) routers, one (1) style drill, one (1) floor grinder, eight (8) drills, seven (7) hognose saws, and seven (7) air routers, are each hand-held equipment, exempted from 326 IAC 6-3 as defined by 326 IAC 2-7-1 (40) (F).

The following equipment : one (1) band saw used to cut 7 shower curtain rods per day, one (1) drywall slitter consisting of two solid blades that crack gypsum board does not produce, dust twelve (12) mitre saws used for cutting miscellaneous pieces of wood throughout the day but not continuously, two (12) radial arm saws one of which makes 32 cuts per day of 2" by 10' board and the other saw cuts vinyl siding and does not produce airborne dust and one (1) drill press used for maintenance purposes each used for processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from rule 326 IAC 6-3

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

Applicability to 326 IAC 8-1-6 requires a best available control technology (BACT) analysis for new facilities commencing operations after January 1, 1980 which have potential VOC emissions of 25 tons or more and not regulated by other provisions of Article 8. Since clean-up solvents and VOC containing materials used to coat plastic, ceramic, formica, gypsum, sheetrock, foam, vinyl, and roof shingles will be restricted to less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 will not apply.

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

Facilities existing as of November 1, 1980 located in LaGrange County with potential VOC emissions of greater than 25 tons per year are subject to the requirements under 326 8-2-9 for miscellaneous metal coating operations. Although the facility commenced operations in 1984, the miscellaneous metal coating operations at this source are for maintenance purposes with potential emission of VOC less than 15 pounds per day. Therefore, the metal coating operations at this source are not subject to the requirements under 326 IAC 8-2-9.

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

Facilities commenced wood furnishing surface coating operations after July 1, 1990 and located in LaGrange County with actual VOC emissions before control of greater than 15 pounds per day are subject to the requirements under 326 IAC 8-2-12 for coated wood furnishing operations. Since the facility commenced operations in 1984, the requirements under 326 IAC 8-2-12 do not apply.

Conclusion

The operation of this manufactured homes assembly plant shall be subject to the conditions of the **Minor Source Operating Permit 087-18373-00024.**

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name: Lincoln Park Homes, a Division of Patriot Homes, Inc.
Source Location: 3195 S. R. 5 North, Shipshewana, Indiana 46565-0610
County: LaGrange
SIC Code: 2451
Operation Permit No.: 087-18373-00024
Permit Reviewer: Femi Ogunsola / EVP

On April 23, 2004, the Office of Air Quality (OAQ) had a notice published in the LaGrange Publishing Company in LaGrange, Indiana, stating that Lincoln Park Homes, a Division of Patriot Homes, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate manufactured homes assembly plant. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed MSOP 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 MSOP should be issued as proposed.

On April 30, Bryan Bucklen on behalf of Lincoln Park Homes, submitted comments on the proposed MSOP permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted).

Comment 1

Page 6 of 6 of the TSD, part (b) of the explanation of rule 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes): The comma in the second paragraph between the words "produce" and "dust" should be moved to after the word "dust". The number "12" describing the number of radial arm saws should be changed to "2". When describing the number of cuts that a radial arm saw makes, the size of the board is 2 inches by 10 inches (2" X 10") not 2 inches by 10 feet (2" X 10').

Response to Comment 4

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

IDEM, OAQ agrees that the introductory section of the TSD should have read as indicated below:

- (b) Pursuant to 326 IAC 6-3-1 (b), woodworking operations from eight (8) circular saws, twelve (12) air drills, one (1) belt sander, eleven (11) routers, one (1) style drill, one (1) floor grinder, eight (8) drills, seven (7) hognose saws, and seven (7) air routers, are each hand-held equipment, exempted from 326 IAC 6-3 as defined by 326 IAC 2-7-1 (40) (F).

The following equipment : one (1) band saw used to cut 7 shower curtain rods per day, one (1) drywall slitter consisting of two solid blades that crack gypsum board does not produce dust, twelve (12) mitre saws used for cutting miscellaneous pieces of wood throughout the day but not continuously, two (2) radial arm saws one of which makes 32 cuts per day of 2" by 10" board and the other saw cuts vinyl siding and does not produce airborne dust and one (1) drill press used for maintenance purposes each used for processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from rule 326 IAC 6-3.

Appendix A: Emission Calculations

Company Name: Lincoln Park Homes, a Division of Patriot Homes, Inc.
Address City IN Zip: 3195 State Road 5 North, Shipshewana, Indiana 46565-0610
Permit Number: MSOP 087-18373-00024
Reviewer: Femi Ogunsola/EVP
Date: March 23, 2004

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Woodworking Emissions	Natural Gas Combustion Emissions	TOTAL
PM	6.26	0.02	0.10	6.38
PM10	6.26	0.02	0.10	6.38
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.90	0.90
VOC	47.12	0.00	0.00	47.12
CO	0.00	0.00	0.20	0.20
total HAPs	11.17	0.00	0.00	11.17
worst case single HAP	6.17	0.00	0.00	6.17
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Woodworking Emissions	Natural Gas Combustion Emissions	TOTAL
PM	3.07	0.02	0.10	3.19
PM10	3.07	0.02	0.10	3.19
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.90	0.90
VOC	23.13	0.00	0.00	23.13
CO	0.00	0.00	0.20	0.20
total HAPs	11.17	0.00	0.00	11.17
worst case single HAP	6.17	0.00	0.00	6.17
Total emissions based on rated capacity at 8,760 hours/year, after control.				

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

Company Name: Lincoln Park Homes, a Division of Patriot Homes, Inc.
Address City IN Zip: 3195 State Road 5 North, Shipshewana, Indiana 46565-0610
Permit Number: MSOP 087-18373-00024
PR ID: 087-00024
Reviewer: Femi Ogunisola/EVP
Date: March 23, 2003

Material	Surface Coated	Type of Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency
Durabond Tile Grout	Ceramic	Adhesive	8.30	90.10%	84.00%	6.10%	84.00%	10.00%	0.015	1.25	3.16	0.51	0.01	0.23	0.04	0.00	5.06	100%
Duraseal	Formica or Ceramic Tile	Adhesive	13.60	17.30%	15.30%	2.00%	24.90%	81.00%	0.044	1.25	0.36	0.27	0.01	0.36	0.07	0.00	0.34	100%
GC-33	Gun Cleaner	Solvent	8.20	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	1.25	8.20	8.20	0.08	1.97	0.36	0.00	#DIV/0!	100%
Instant Bond Glue	Wood	Adhesive	9.80	60.30%	60.00%	0.30%	70.60%	29.10%	0.139	1.25	0.10	0.03	0.01	0.12	0.02	0.00	0.10	100%
Floor Sealer	Wood	Adhesive	8.69	80.00%	79.86%	0.14%	83.33%	16.49%	0.169	1.25	0.07	0.01	0.00	0.06	0.01	0.00	0.07	100%
Joint Compound	Gypsum	Adhesive	15.05	28.55%	28.50%	0.05%	51.33%	48.58%	0.355	1.25	0.02	0.01	0.00	0.08	0.01	0.00	0.02	100%
Lighthouse Formula 1	Vinyl, Foam, or Wood	Adhesive	7.76	32.85%	0.00%	32.85%	0.00%	62.73%	0.118	1.25	2.55	2.55	0.38	9.02	1.65	0.00	4.06	100%
Mineral Spirits	Clean Tools	Solvent	6.40	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	1.25	6.40	6.40	0.03	0.77	0.14	0.00	#DIV/0!	100%
Oatey Cleaner	Clean Rubber	Solvent	6.70	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	1.25	6.70	6.70	0.03	0.80	0.15	0.00	#DIV/0!	100%
Panel Nu	Cupboard Cleaner	Solvent	7.16	54.34%	44.42%	9.92%	38.20%	46.09%	0.075	1.25	1.15	0.71	0.07	1.60	0.29	0.67	1.54	50%
Pur Adhesive	Gypsum to Wood	Adhesive	9.35	2.20%	0.00%	2.20%	0.00%	97.40%	0.789	1.25	0.21	0.21	0.20	4.87	0.89	0.00	0.21	100%
Sta' Put	Plastic to Vinyl	Adhesive	7.00	70.00%	5.00%	65.00%	4.20%	25.00%	0.047	1.25	4.75	4.55	0.27	6.42	1.17	0.27	18.20	50%
Vapor Barrier	Sheetrock	Coating	9.80	80.30%	77.50%	2.80%	90.40%	31.50%	1.439	1.25	2.86	0.27	0.49	11.85	2.16	3.80	0.87	75%
Weid-On 773	Plastic	Adhesive	7.22	80.00%	0.00%	80.00%	0.00%	20.00%	0.003	1.25	5.78	5.78	0.02	0.52	0.09	0.01	28.88	50%
Weidwood Solvent 901	Formica	Solvent	6.75	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	1.25	6.75	6.75	0.03	0.81	0.15	0.00	#DIV/0!	100%
Window Washer	Plastic	Solvent	7.84	100.00%	70.00%	30.00%	65.00%	0.00%	0.443	1.25	6.72	2.35	1.30	31.26	5.70	0.00	#DIV/0!	100%
F2100A*	Gypsum to Wood	Coating	10.24	50.00%	0.00%	50.00%	0.00%	0.00%	2.797	1.25	5.12	5.12	17.90	429.59	0.00*	0.00	#DIV/0!	100%
Shingle Tile	Roof Shingles	Coating	9.60	19.71%	0.00%	19.71%	0.00%	70.90%	0.170	1.25	1.89	1.89	0.40	9.65	1.76	0.00	2.67	100%
924 Rebond Latex	Gypsum	Adhesive	8.00	53.00%	51.00%	2.00%	49.00%	48.50%	0.051	1.25	0.31	0.16	0.01	0.24	0.04	0.00	0.33	100%
Carnie 22/80	Wallboard and Countertop Cleaner	Cleaner	6.70	87.60%	17.30%	70.30%	13.90%	9.60%	0.003	1.25	5.47	4.71	0.02	0.42	0.08	0.01	49.06	50%
Carnie 50B	Wallboard and Countertop Cleaner	Cleaner	6.40	95.50%	0.00%	95.50%	0.00%	3.60%	0.003	1.25	6.11	6.11	0.02	0.55	0.10	0.00	169.78	50%
Grundy Cold	Tar Paper & Shingles	Cement	8.80	23.31%	0.00%	23.31%	0.00%	68.46%	2.142	1.25	2.05	2.05	5.49	131.82	24.06	0.00	3.00	100%
Grundy Plastic	Metal or Plastic	Cement	9.60	19.71%	0.00%	19.71%	0.00%	70.90%	0.482	1.25	1.89	1.89	1.14	27.36	4.99	0.00	2.67	100%
Carlton PVC Solvent	Plastic	Cement	7.96	73.00%	0.05%	72.95%	0.05%	27.00%	0.001	1.25	5.81	5.81	0.01	0.17	0.03	0.00	21.51	100%
Con-Bond 773	Formica to Wood	Adhesive	6.70	79.50%	0.00%	79.50%	0.00%	13.60%	0.013	1.25	5.33	5.33	0.09	2.08	0.38	0.00	39.17	100%
Construction 920	Vinyl	Adhesive	13.60	17.30%	15.30%	2.00%	24.90%	81.00%	0.026	1.25	0.36	0.27	0.01	0.21	0.04	0.00	0.34	100%
Brake & Parts Cleaner	Tool Cleaner	Solvent	6.21	100.00%	0.00%	100.00%	0.00%	0.00%	0.001	1.25	6.21	6.21	0.01	0.19	0.03	0.00	#DIV/0!	100%
Ener 10	Gun Cleaner	Solvent	11.00	9.60%	0.00%	9.60%	0.00%	92.80%	0.002	1.25	1.06	1.06	0.00	0.06	0.01	0.05	1.14	50%
Ener 42	Gypsum to Wood Cleaner	Solvent	10.00	25.00%	0.00%	25.00%	0.00%	75.50%	0.068	1.25	2.50	2.50	0.21	5.10	0.93	1.40	3.31	50%
Cyclo Silicone	Tool Lubricant	Coating	5.25	91.75%	0.00%	91.75%	0.00%	5.34%	0.037	1.25	4.82	4.82	0.22	5.35	0.98	0.04	90.20	50%
S-330	Vinyl Cleaner	Cleaner	8.30	92.80%	83.70%	9.10%	84.43%	6.74%	0.004	1.25	4.85	0.76	0.00	0.09	0.02	0.00	11.21	100%
S-390	Vinyl	Polish	8.70	78.35%	73.40%	4.95%	72.10%	23.00%	0.004	1.25	1.54	0.43	0.00	0.05	0.01	0.00	1.87	100%
Weidwood Cleaner	Plastic	Solvent	10.93	100.00%	0.00%	100.00%	0.00%	0.00%	0.012	1.25	10.93	10.93	0.16	3.93	0.72	0.00	#DIV/0!	100%
Frame Paint	Steel	Coating	8.43	74.30%	72.30%	2.00%	76.80%	25.00%	0.030	1.25	0.73	0.17	0.01	0.15	0.03	0.00	0.67	100%

Uncontrolled Potential Emissions	28.66	687.75	47.12	6.26
Controlled Potential Emissions (based on annual material usage limitation of 50.9%(4,459 hours) of the annual (8760 hours) rated usage)			23.13	3.07

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

*Potential VOC emissions from the coating material Foamseal (I.D.Number 2100A) are negligible since VOC is contained in the material after application (bas on manufacturer's engineering documentation).

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

Company Name: Lincoln Park Homes, a Division of Patriot Homes, Inc.
Address City IN Zip: 3195 State Road 5 North, Shipshewana, Indiana 46565-061
Permit Number: 087-18373-00024
Permit Reviewer: Femi Ogunsola/EVP
Date: March 23, 2004

Coating or Solvent	Paint Booth ID Number (s)	Amount used per unit (gal/unit)	Production units per hour (units/hr)	Annual Usage (gal/yr)	Coating or Solvent Density (lbs/gal)	Annual Weight of coating or solvent used (lbs/yr)	MDI	Ethylene Glycol	MEK	Hexane	Methanol	Methyl Chloride	Methyl Chloroform	Methylene Chloride	Toluene	1,4 Dioxane	Vinyl Acetate	Glycol Ethers	Total HAPs	
							Weight % (tons/yr)													
Cement (as applied)	Carlton PVC Solvent	0.001	1.250	6	7.96	44	0.0%	0.0%	48.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01
Adhesive (as applied)	Instant Bond Glue	0.139	1.250	775	9.80	7,593	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.01
Adhesive (as applied)	Con-Bond 773	0.013	1.250	72	6.70	485	0.0%	0.0%	0.0%	39.8%	0.0%	0.0%	0.0%	0.0%	18.6%	0.0%	0.0%	0.0%	0.0%	0.14
Solvent (as applied)	Brakes & Parts Cleaner	0.001	1.250	22	6.21	136	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.0%	0.0%	0.0%	0.0%	0.0%	0.01
Solvent (as applied)	GC-33	0.008	1.250	45	8.20	366	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.09
Adhesive (as applied)	Joint Compounds	0.355	1.250	1,979	15.05	29,779	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.15
Adhesive (as applied)	Lighthouse Formula	0.118	1.250	658	7.76	5,104	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.0%	0.0%	0.0%	0.0%	0.0%	0.15
Solvent (as applied)	Oatey Cleaner	0.004	1.250	22	6.70	149	0.0%	0.0%	95.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.07
Adhesive (as applied)	Pur Adhesive	0.789	1.250	4,398	9.35	41,118	30.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.17
Adhesive (as applied)	StaPut	0.047	1.250	262	7.00	1,834	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	55.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.50
Adhesive (as applied)	Weld-On 773	0.003	1.250	17	7.22	121	0.0%	0.0%	75.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.05
Solvent (as applied)	Weldwood Std. 901	0.004	1.250	22	6.75	150	0.0%	0.0%	0.0%	69.0%	0.0%	0.0%	0.0%	0.0%	30.0%	0.0%	0.0%	0.0%	0.0%	0.07
Solvent (as applied)	Window Washer	0.443	1.250	2,469	7.84	19,358	0.0%	0.0%	0.0%	0.0%	40.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.87
Coating (as applied)	F2100A	2.7968	1.250	15,589	10.24	159,628	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00
Solvent (as applied)	Ener 10	0.002	1.250	11	11.00	123	0.0%	0.0%	0.0%	0.0%	0.0%	25.0%	75.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.06
Solvent (as applied)	Ener 42	0.068	1.250	379	10.00	3,790	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%	0.0%	0.02
Polish (as applied)	S-390	0.004	1.250	22	8.70	194	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	0.0%	0.00
Solvent (as applied)	Weldwood Cleaner	0.012	1.250	67	10.93	731	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	97.5%	0.0%	0.0%	2.5%	0.0%	0.0%	0.0%	0.37
Total Potential Air Toxics Emissions (as applied by the applicator):							(tons/yr)	6.17	0.15	0.13	0.15	3.87	0.02	0.40	0.50	0.24	0.01	0.01	0.12	11.77
							(gm/sec)	0.18	0.00	0.00	0.00	0.11	0.00	0.01	0.01	0.01	0.00	0.00	0.00	0.34

Methodology:

Total Potential Air Toxic Emissions assumes the sum of all coatings and cleaning agents used, based on annual coating material usage restricted to 50.9% (4,459 hours) of the rated usage for 8,760 hours, as applied to the applicators.

All materials reflect "as applied" by the applicator.

Annual Usage (gal/yr) = Amount Used per Unit (gal/unit) * Production Units per Hour * 4459 (hrs/yr).

Annual Weight of Coating or Solvent Used = Annual Usage (gal/yr) * Coating or Solvent Density (lbs/gal)

Air Toxic Tons per Year = Annual Weight of Coating or Solvent Used (lbs/yr) * Weight % Air Toxic * (1 ton/2,000 lbs)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

** Potential MDI emissions from the coating material Foamseal (I.D. Number F2100A) negligible based on engineering documentation supplied by the manufacturer.

Appendix A: Process Particulate Emissions

Company Name: Lincoln Park Homes, a Division of Patriot Homes, Inc.
 Address City IN Zip: 3195 State Road 5 North, Shipshewana, Indiana 46565-0610
 Permit Number: MSOP 087-18373-00024
 Reviewer: Femi Ogunsola/EVP
 Date: March 23, 2004

State Potential Emission (tons/year)					
Process	Total PM Collected at Dry Collector (ton/year)	Control Efficiency	Actual Hours per Year of Operation	Potential Hours per Year of Operation	Total (ton/year)
Woodworking equipment w	24.7	99.98%	1960	8760	0.02
ed Capacity at 8760 Hours					0.02
<u>Methodology</u>					
PM Potential (ton/yr) = tons PM collected / % collector efficiency * potential hours / actual hours * (1 - collector efficiency)					
Federal Potential Emissions (tons/year)					
Process	Total PM Collected at Dry Collector (ton/year)	Control Efficiency	Actual Hours per Year of Operation	Potential Hours per Year of Operation	Total (ton/year)
Woodworking equipment w	24.7	99.98%	1960	8760	0.02
ed Capacity at 8760 Hours					0.02
<u>Methodology</u>					
PM Potential (ton/yr) = tons PM collected / % collector efficiency * potential hours / actual hours * (1 - collector efficiency)					
Total emissions based on rated capacity at 8,760 hours of operation per year and source controls.					
Potential PM emissions from woodworking processes are considered after control only.					
326 IAC 6-3-2 Compliance Calculation					
Process	Process Weight lbs/hr	Process Weight tons/hr	Emission Rate Allowable Limit lbs/hr	Potential Emission Rate lbs/hr	Status
Woodworking equipment w	6414.3	3.21	8.95	0.005	will comply
<u>Methodology</u>					
E = (4.10 * P ^{0.67}) (For process weights less than 60,000 lbs/hr)					
E = allowable emission rate in lbs/hr					
P = process weight in tons/hr					

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Commercial Boiler**

**Company Name: Lincoln Park Homes, Division of Patriot Homes, Inc.
 Address City IN Zip: 3195 State Road 5 North, Shipshewana, Indiana 46565-0610
 MSOP : 087-18373-00024
 Reviewer: Femi Ogunsola/EVP
 Date: March 23, 2004**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.1

18.2

Emission Factor in lb/MMCF	Pollutant					
	PM 12.0	PM10 12.0	SO2 0.6	NOx 100.0	VOC 5.3	CO 21.0
Potential Emission in tons/yr	0.1	0.1	0.0	0.9	0.0	0.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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