



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 30, 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: Damon Corporation / 039-18558-00285
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03

April 30, 2004

Mr. Tim Howard
Damon Corporation - Breckenridge
656 North Delaware Street
Nappanee, IN 46515

Re: 039-18558
Notice Only Change
MSOP 039-16020-00285

Dear Mr. Howard:

Damon Corporation (Breckenridge) was issued a permit on March 24, 2003 for recreational vehicle assembly plant. A letter notifying the Office of Air Quality of a change was received on February 20, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

The modification consists of adding the following operation and equipment to Damon Plant 10 located at 345 North Delaware Street, Nappanee, Indiana 46515. This plant is adjacent to their plant at 656 North Delaware Street.

Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm and as a maximum grain loading of 0.02 gr/dscf (located at Plant 10).

- (1) One Radial Arm Saw
- (2) One Table Saw

Changes to 326 IAC 2-6, the Emissions Statement Reporting Rule.

The Indiana Air Pollution Control Board has made significant changes to the Emissions Statement Reporting Rule, henceforth the requirement for reporting is now based on the following guidelines. If a source emits less than 5 tons of lead, is not located in Lake or Porter County and does not qualify for a Part 70 permit it is no longer required to report emissions under 326 IAC 2-6. Damon Corporation under permit 039-16020-00285 meets all of these requirements therefore, they will no longer be subject to reporting requirements for VOC under permit 039-16020-00285 and Section C.12 Emission Statement [326 IAC 2-6] has been removed from the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Walter Habeeb, at (800) 451-6027, press 0 and ask for Walter Habeeb or extension 2 -8422, or dial (317) 232-8422.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

WVH

cc: File - Elkhart County
U.S. EPA, Region V
Air Compliance Section Inspector Paul Karkiewicz
Compliance Data Section
Administrative and Development

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Damon Corporation - Breckenridge
656 N. Delaware
Nappanee, Indiana 46515**

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

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

Operation Permit No.: MSOP 039-16020-00285	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2003 Expiration Date: March 24, 2008
First Notice of Change: 039-18558	Pages Affected: 2,4, 5,12,15,17,18 and 19
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 30, 2004

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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.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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a recreational vehicle assembly plant.

Authorized Individual: Tim Howard
Source Address: 656 N. Delaware, Nappanee, Indiana 46550
Mailing Address: P.O. Box 2888, Elkhart, Indiana 46515
General Source Phone: 574-266-0443
SIC Code: 2451
County Location: Elkhart
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit

A.2 MSOP Source Definition (326 IAC 2-6-4)

This recreational vehicle assembly company consists of two (2) plants:

- (a) Plant 5 is located at 656 North Delaware Street, Nappanee, Indiana.
- (b) Plant 10 is located at 345 North Delaware Street, Nappanee, Indiana.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

A.3 Emissions Units and Pollution Control Equipment Summary

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

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).
 - 1) One Radial Are Saw.
 - 2) One Table Saw
- (c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.

- (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.
- (d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.
- (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.
- (e) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

Record Keeping and Reporting Requirements

C.12 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.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information 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 kept 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.14 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 semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does 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

FACILITY OPERATION CONDITIONS

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

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).
 - 1) One Radial Are Saw.
 - 2) One Table Saw
- (c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

(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 (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation (located at Plant 5) shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.

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

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

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable emissions rate from the woodworking operations (located at Plant10) which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The Jet portable dust collector shall be in operation at all times the wood cutting operation in Plant 10 is in operation in order to comply with this limit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.
- (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

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

Emissions Limitations and Standards

D.2.1 Particulate (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 -2 (e)(2) the allowable particulate rate from the assembly line operation which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total VOC content of materials applied by the various methods in this section to the various assemble parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on monthly basis.
 - (1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month.
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each monthly compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (e) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

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

There are no applicable requirements for these facilities.

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

Technical Support Document (TSD) for a Notice Only Change

Source Background and Description

Source Name:	Damon Corporation - Breckenridge
Source Location:	656 N. Delaware, Nappanee, Indiana 46515
County:	Elkhart
SIC Code:	2451
Operation Permit No.:	039-16020-00285
Operation Permit Issuance Date:	March 24, 2003
Permit Revision (or Renewal) No.:	039-18558
Permit Reviewer:	Walter Habeeb

The Office of Air Quality (OAQ) has reviewed an application from Damon Corporation relating to the construction and operation of recreational vehicle assembly plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices (located at Damon Plant 10 at 345 North Delaware Street, Nappanee, Indiana 46515. Damon Plant 10 is located adjacent to Damon Corporation plant at 656 North Delaware Street, Nappanee, Indiana):

- (b) Wood cutting equipment (located at Plant 10) and connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf.
 - 1) One Radial Arm Saw.
 - 2) One Table Saw.

Source Definition

The Source Definition is revised as follows:

This recreational vehicle assembly company consists of two (2) plants:

- (a) Plant 5 is located at 656 North Delaware Street, Nappanee, Indiana; and
- (b) Plant 10 is located at 345 North Delaware Street, Nappanee, Indiana.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Existing Approvals

The source has been operating under previous approval MSOP 039-16020-000285 issued on March 24, 2003.

All conditions from previous approvals were incorporated into this permit.

Justification for the Revision

The MSOP is being modified through a notice only change.

- (1) This minor source operating permit program exemption is being performed pursuant to 326 IAC 2-6.1-1(1).
- (2) The addition of a portable source or relocation of a portable source to an existing source, if the addition or relocation would require a change to any permit terms or conditions.

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.

An application for the purposes of this review was received on February 20, 2004, with additional information received on March 8, 2004.

Emission Calculations

See Appendix A (page 1 of 1) of this document for detailed emission calculations.

Potential to Emit of the Revision 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	3.56
PM-10	3.56
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

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

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 other 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.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

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	4.75
PM-10	3.22
SO ₂	0.0
VOC	45.27
CO	0.10
NO _x	0.50
Single HAP	4.67
Combination HAPs	9.95

- (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..

Proposed Modification

PTE from the proposed modification (based on air flow and maximum grain loading capacity of the Jet portable dust collector):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.488	0.488	0.00	0.00	0.00	0.00
PSD or Offset Threshold Level	100	100	100	100	100	100

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-18558-00285, 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.

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) 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.
- (c) 40 CFR Part 63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), This source is not subject to 40 CFR Part 63 Subpart JJ because this source does not manufacture wood furniture or wood furniture components as defined by Subpart JJ.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (HAP's Major Sources)

This source emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of all HAPs, therefore, 326 IAC 2-4.1-1 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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4-2 (Fugitive dust emissions: emission limitations)

A source or source generating fugitive dust shall be in violation of this rule ((236 IAC 6-4) if any of the following criteria are violated:

- (a) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (b) If fugitive dust is visible crossing the boundary or property line of a source.

State Rule Applicability - Individual Facilities

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

The particulate from the wood cutting operation of Plant 10 shall be limited by the following:

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from the woodworking operations (located at Plant 10) which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The Jet portable dust collector shall be in operation at all times the wood cutting operation in Plant 10 is in operation in order to comply with this limit.

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

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

- (a) A single hazardous pollutant (HAP) is less than 10 tons per year, and
- (b) Any combination of HAPs is less than 25 tons per year.

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

This source has agreed to a limit VOC usage to less than 25 tons per 12 consecutive month period. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.

326 IAC 8-11-3 (Wood Furniture Coating)

This source is not subject to the requirements of 326 IAC 8-11-3 because this source only applies surface coating to interior wood and gypsum walls of manufactured homes and not to wood furniture.

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

This source is not subject to the requirements of 326 IAC 8-2-12 because this rule applies to cabinet wood parts of the product. There are no coatings applied to cabinets, as the cabinets come pre stained or vinyl wrapped. The rest of the wood in the product that receives coatings is structural wood and not subject to this rule.

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

This source is not subject to the requirements of 326 IAC 8-2-9 because this rule applies to coating of metal parts and all metal parts for this source are received pre coated.

Conclusion

The operation of this recreational vehicle assembly plant shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision 039-18558-00285.

Proposed Changes (bold has been added and strikeout has been omitted)

A.2 MSOP Source Definition (326 IAC 2- 6.1- 4)

This recreational vehicle assembly company consists of two (2) plants:

- (a) Plant 5 is located at 656 North Delaware Street, Nappanee, Indiana; and**
- (b) Plant 10 is located at 345 North Delaware Street, Nappanee, Indiana.**

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

A.2 (3) Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices **(all emissions units are located at Plant 5 unless specifically noted otherwise):**

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).**
 - 1) One Radial Arm Saw.**
 - 2) One Table Saw.**
- (b)(c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.**
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.
- ~~(e)~~**(d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.**
 - (1) ABS cement applied to drainpipe by brush.

- (2) AH solvent free floor sealer applied to floors by roller.
- (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
- (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
- (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
- (6) Spray can adhesive is used for installing fiberglass insulation.
- (7) Putty tape and caulking are used for windows, doors and trim installation.
- (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
- (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
- (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

~~(d)~~(e) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

Section D.1

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).**
 - 1) One Radial Arm Saw.**
 - 2) One Table Saw.**
- ~~(b)~~(c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

Changes to 326 IAC 2-6, the Emissions Statement Reporting Rule.

The Indiana Air Pollution Control Board has made significant changes to the Emissions Statement Reporting Rule, henceforth the requirement for reporting is now based on the following guidelines. If a source emits less than 5 tons of lead, is not located in Lake or Porter County and does not qualify for a Title 5 permit it is no longer required to report emissions under 326 IAC 2-6. Damon Corporation under permit 039-16020-00285 meets all of these requirements therefore, they will no longer be subject to reporting requirements for VOC under permit 039-16020-00285 and Section C.13 Emission Statement [326 IAC 2-6] has been removed from the permit.

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- C.14 45 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

~~C.13 Emission Statement [326 IAC 2-6]~~

- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - ~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
 - ~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~~~
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 31. The annual emission statement must be submitted to:
Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation (located at Plant 5) shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate rate from the woodworking operations (located at Plant 10) which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The Jet portable dust collector shall be in operation at all times the wood cutting operation in Plant 10 is in operation in order to comply with this limit.

The following is a correction to Section D.2.1 of permit 039-16020-00285 to allow compliance with a change in rule 329 iAC 6-3-2.

D.2.1 Particulate (PM) [326 IAC 6-3]

~~Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the assembly line operation shall not exceed 0.14 pounds per hour when operating at a process weight rate of 12.6 pounds per hour.~~

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate rate from the assembly line operations which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Appendix A: Emissions Calculations (PM 10)
From Wood Cutting Operations

Company Name: Damon Corporation
Address: 656 N. Delaware, Nappanee, IN 46550
CP: 039-18558
Plt. ID: 039-00285
Reviewer: Walter Habeeb

Facility Description

Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf.

- (1) One Radial Arm Saw.
- (2) One Table Saw.

Potential Emissions

For wood cutting operations that are attached to a control device.

The following calculations determine the PM emissions from the wood cutting operations attached to a Jet portable dust collector based on the amount of dust collected:

Before control:

Operation generates maximum of *19.53 lb/day (0.814 lb/hr) of saw dust.

$$\begin{aligned} \text{PM}_{10} \text{ emission (before control)} &= \frac{(0.814 \text{ lb/hr}) (24 \text{ hr/day}) (365 \text{ day/yr})}{(2000 \text{ lb/ton})} \\ &= 3.56 \text{ tons per year} \end{aligned}$$

After control:

$$\begin{aligned} \text{PM}_{10} \text{ emissions} &= \frac{(\text{collector loading gr/dscf}) (\text{max. collector flow rate dscf/min}) (60 \text{ min/hr})}{(7000 \text{ gr/lb})} \\ &= 0.111 \text{ lb/hr} \\ &= \frac{(0.111 \text{ lb/hr}) (24 \text{ hr/day}) (365 \text{ day/yr})}{(2000 \text{ lb/ton})} \\ &= 0.488 \text{ tons per year} \end{aligned}$$

* Based on information supplied by source.