



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: January 13, 2006
RE: Indiana Building Systems / 039-18977-00489
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 1/10/05



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Indianapolis, Indiana 46204-2251
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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**Indiana Building Systems, LLC
51700 Lovejoy Drive
Middlebury, Indiana 46540**

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

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

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

Operation Permit No.: F 039-18977-00489	
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: January 13, 2006 Expiration Date: January 13, 2011

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Authorized individual:	President
Source Address:	51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address:	51700 Lovejoy Drive, Middlebury, Indiana 46540
General Source Phone:	574 - 825 - 3700
SIC Code:	3710
Source Location Status:	Elkhart
	Attainment for the 1-hour ozone standard
	Basic nonattainment for the 8-hour ozone standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This modular home manufacturing source consists of two (2) plants:

- (a) Plant 1 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540; and
- (b) Plant 2 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540.

Both Plant 1 and Plant 2 have the same plant identification number, 039-00489, for IDEM, OAQ tracking purposes

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source effective with the issuance of FESOP 039-9757-00489, issued on July 21, 2000.

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

The stationary source consists of the following independent and parallel facilities, and pollution control devices, collectively identified as EU-1:

- (a) One (1) factory built housing facility, identified as Plant 1, installed in 1995, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 3 through GV 7 and one (1) baghouse, identified as BH1, controlling particulate from cutting, sawing and grinding operations, capacity: 1.5 floors per hour and 1.90 tons of materials per hour.

- (b) One (1) factory built housing facility, identified as Plant 2, installed in 1997, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 8 through GV 12, and one (1) baghouse, identified as BH2, and two (2) portable baghouses, identified as BH3 and BH4, controlling particulate from grinding and machining operations with process weight rates of 0.32 tons of materials per hour per baghouse, capacity: 1.5 floors per hour and 0.959 tons of materials per hour.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 13.050 million British thermal units per hour, consisting of:
 - (1) Thirteen (13) infra-red radiant heaters, identified as HU 1 - HU 13, located in Plant 1, rated at 0.200 million British thermal units per hour each.
 - (2) Thirteen (13) infra-red radiant heaters, identified as HU 14 - HU 26, located in Plant 2, rated at 0.200 million British thermal units per hour each.
 - (3) One (1) infra-red radiant heater, identified as HU 27, located in Plant 1, rated at 0.125 million British thermal units per hour.
 - (4) One (1) infra-red radiant heater, identified as HU 28, located in Plant 2, rated at 0.125 million British thermal units per hour.
 - (5) One (1) forced air heater, identified as HU 29, located in Plant 1, rated at 0.600 million British thermal units per hour.
 - (6) One (1) forced air heater, identified as HU 30, located in Plant 2, rated at 0.600 million British thermal units per hour.
 - (7) Sixteen (16) infra-red radiant heaters, identified as HU 31 - HU 46, located in Plant 1, rated at 0.200 million British thermal units per hour each.
 - (8) Sixteen (16) infra-red radiant heaters, identified as HU 47 - HU 62, located in Plant 2, rated at 0.200 million British thermal units per hour each.
- (b) Water-based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone (326 IAC 6-3-2).
- (e) Paved and unpaved roads and parking lots with public access.

- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP consisting of maintenance welding with manganese compounds of less than five (5%) percent by weight. Indiana Building Systems, LLC uses one (1) pound box of AWS E7014 per six (6) months.
- (h) Woodworking operations = 0.015 pounds per hour PM₁₀, drywall trimming = 0.010 pounds per hour PM₁₀, blown-in attic insulation = 0.97 pounds per hour PM₁₀.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain Preventive Maintenance Plans (PMPs), including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitation provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [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 one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

-
- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 17, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Independent and parallel facilities, collectively identified as EU-1:

- (a) One (1) factory built housing facility, identified as Plant 1, installed in 1995, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 3 through GV 7 and one (1) baghouse, identified as BH1, controlling particulate from cutting, sawing and grinding operations, capacity: 1.5 floors per hour and 1.90 tons of materials per hour.
- (b) One (1) factory built housing facility, identified as Plant 2, installed in 1997, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 8 through GV 12, and one (1) baghouse, identified as BH2, and two (2) portable baghouses, identified as BH3 and BH4, controlling particulate from grinding and machining operations with process weight rates of 0.32 tons of materials per hour per baghouse, capacity: 1.5 floors per hour and 0.959 tons of materials per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to F 039-9757-00489, issued on July 21, 2000 and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the surface coating operations is:

- (a) Material substitution which limits the potential VOC delivered to the applicators to 218.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month from Plants 1 and 2, identified as EU-1.
- (b) The maximum VOC content of any coating shall be 7.16 pounds of VOC per gallon of coating less water.
- (c) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.
 - (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.

- (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (6) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spillage on the floor.
- (7) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

D.1.2 VOC Limitation [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4, the VOC delivered to the applicators in Plants 1 and 2, identified as EU-1, shall be less than 97.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-7 and 326 IAC 2-3 not applicable and also satisfies the VOC limit of 218.7 tons of VOC per twelve (12) consecutive month period in Condition D.1.1(a).

D.1.3 HAPs Limitations [326 IAC 2-8-4] [326 IAC 2-4.1]

- (a) The worst case single HAP delivered to the coating applicators in Plants 1 and 2, identified as EU-1, shall be less than a total of ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The combination of HAPs delivered to the coating applicators in Plants 1 and 2, identified as EU-1, shall be limited to less than a total of twenty-four and five tenths (24.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) Compliance with these limits makes the requirements of 326 IAC 2-7 and 326 IAC 2-4.1 not applicable.

D.1.4 PM and PM₁₀ Limitations Plant 1 [326 IAC 2-2] [326 IAC 2-8-4]

- (a) The PM emission rate from:
 - (1) The cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, controlled by baghouse, identified as BH1, exhaust shall be limited to 6.30 pounds per hour. Compliance with this limit makes the requirements of 326 IAC 2-2 not applicable.
 - (2) The grinding and machining operations in factory built housing facility, identified as Plant 2, controlled by baghouses, identified as BH2, BH3 and BH4, exhausts shall each be limited to 1.91 pounds per hour. Compliance with these limits makes the requirements of 326 IAC 2-2 not applicable.
- (b) The PM₁₀ emission rate from:
 - (1) The cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, controlled by baghouse, identified as BH1, exhaust shall be limited to 6.30 pounds per hour. Compliance with this limit makes the requirements of 326 IAC 2-2 not applicable and satisfies the requirements of 326 IAC 2-8-4.

- (2) The grinding and machining operations in factory built housing facility, identified as Plant 2, controlled by baghouses, identified as BH2, BH3 and BH4, exhausts shall each be limited to 1.91 pounds per hour. Compliance with these limits makes the requirements of 326 IAC 2-2 not applicable and satisfies the requirements of 326 IAC 2-8-4.

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes in Plants 1 and 2 shall be controlled by a tarp or an equivalent control device, and the Permittee shall keep the tarp in place at all times when spray applicators are in use.

D.1.6 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the construction and assembly operations controlled by the baghouse, identified as BH1, shall not exceed 6.30 pounds per hour when operating at a process weight rate of 1.90 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grinding and machining operations in Plant 2 controlled by the baghouses, identified as BH2, BH3 and BH4, shall each not exceed 1.91 pounds per hour, when operating at process weight rates of 0.32 tons per hour, each.

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

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

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plants 1 and 2, identified as EU-1 and their control devices.

Compliance Determination Requirements

D.1.8 Particulate Control

- (a) In order to comply with Conditions D.1.4 and D.1.6, the baghouses, identified as BH1, BH2, BH3 and BH4, for particulate control shall be in operation and control emissions from the construction and/or assembly operations in Plant 1 and grinding and machining operations in Plant 2 at all times that these processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this FESOP (F 039-18977-00489), in order to demonstrate compliance with Condition D.1.4(a)(1), the Permittee shall perform PM testing for baghouse BH1 exhaust utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2]
[326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 as well as the HAPs usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the tarps. To monitor the performance of the tarps, weekly observations shall be made of the overspray from the surface coating while surface coating processes are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.12 Visible Emissions Notations

- (a) Visible emissions notations of the baghouse BH1, BH2, BH3 and BH4 exhausts shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee will 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.13 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses, identified as BH1, BH2, BH3 and BH4, used in conjunction with the construction and/or assembly operations in Plant 1 and the grinding and machining operations in Plant 2 at least once per day when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across

the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.1.14 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC, single HAP and the combination of HAPs usage for each month; and

- (5) The weight of VOCs, single HAP and the combination of HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.11 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain records of visible emission notations of the baghouse BH1, BH2, BH3 and BH4 exhausts once per day when venting to the atmosphere.
- (d) To document compliance with Condition D.1.13, the Permittee shall maintain records once per day of the pressure drop during normal operation when venting to the atmosphere.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone (326 IAC 6-3-2).

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimmers shall not exceed the emission rate determined 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:

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

Compliance Determination Requirements

D.2.2 Particulate Control

- (a) In order to comply with Condition D.2.1, the trim material recovery device, such as a bag filter or cyclone for particulate control, shall be in operation and control emissions from the trimmers at all times that the trimming operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

Source Name: Indiana Building Systems, LLC
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-18977-00489

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Indiana Building Systems, LLC
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-18977-00489

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Indiana Building Systems, LLC
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-18977-00489
Facilities: Two (2) factory built housing facilities, identified as Plant 1 and Plant 2, collectively identified as EU-1.
Parameter: VOC delivered to the applicators
Limit: Less than 97.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Indiana Building Systems, LLC
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-18977-00489
Facilities: Two (2) factory built housing facilities, identified as Plant 1 and Plant 2, collectively identified as EU-1.
Parameter: Single HAP delivered to the applicators
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Indiana Building Systems, LLC
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-18977-00489
Facilities: Two (2) factory built housing facilities, identified as Plant 1 and Plant 2, collectively identified as EU-1.
Parameter: Combination of HAPs delivered to the applicators
Limit: Less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs HAP (tons)	Combination of HAPs HAP (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Indiana Building Systems, LLC
 Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
 Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
 FESOP No.: F 039-18977-00489

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

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

Source Background and Description

Source Name:	Indiana Building Systems, LLC
Source Location:	51700 Lovejoy Drive, Middlebury, Indiana 46540
County:	Elkhart
SIC Code:	3710
Operation Permit No.:	F 039-9757-00489
Operation Permit Issuance Date:	July 21, 2000
Permit Renewal No.:	F 039-18977-00489
Permit Reviewer:	Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Indiana Building Systems, LLC relating to the operation of a stationary modular home manufacturing source.

Source Definition

The source definition from the previous FESOP was incorporated into this permit as follows:

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

- (a) Plant 1 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540; and
- (b) Plant 2 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540.

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

Both Plant 1 and Plant 2 have the same plant identification number, 039-00489, for IDEM, OAQ tracking purposes.

Permitted Emission Units and Pollution Control Equipment

The stationary source consists of the following permitted independent and parallel facilities, and pollution control devices, collectively identified as EU-1:

- (a) One (1) factory built housing facility, identified as Plant 1, installed in 1995, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 3 through GV 7 and one (1) baghouse, identified as BH1, controlling particulate from cutting, sawing and grinding operations, capacity: 1.5 floors per hour and 1.90 tons of materials per hour.
- (b) One (1) factory built housing facility, identified as Plant 2, installed in 1997, consisting of the following activities: fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, equipped with roll, flow and spray coating applicators, equipped with a tarp behind and around the modular homes being painted, exhausted to GV 8 through GV 12, and one (1) baghouse, identi-

fied as BH2, and two (2) portable baghouses, identified as BH3 and BH4, controlling particulate from grinding and machining operations with process weight rates of 0.32 tons of materials per hour per baghouse, capacity: 1.5 floors per hour and 0.959 tons of materials per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 13.050 million British thermal units per hour, consisting of:
 - (1) Thirteen (13) infra-red radiant heaters, identified as HU 1 - HU 13, located in Plant 1, rated at 0.200 million British thermal units per hour each.
 - (2) Thirteen (13) infra-red radiant heaters, identified as HU 14 - HU 26, located in Plant 2, rated at 0.200 million British thermal units per hour each.
 - (3) One (1) infra-red radiant heater, identified as HU 27, located in Plant 1, rated at 0.125 million British thermal units per hour.
 - (4) One (1) infra-red radiant heater, identified as HU 28, located in Plant 2, rated at 0.125 million British thermal units per hour.
 - (5) One (1) forced air heater, identified as HU 29, located in Plant 1, rated at 0.600 million British thermal units per hour.
 - (6) One (1) forced air heater, identified as HU 30, located in Plant 2, rated at 0.600 million British thermal units per hour.
 - (7) Sixteen (16) infra-red radiant heaters, identified as HU 31 - HU 46, located in Plant 1, rated at 0.200 million British thermal units per hour each.
 - (8) Sixteen (16) infra-red radiant heaters, identified as HU 47 - HU 62, located in Plant 2, rated at 0.200 million British thermal units per hour each.
- (b) Water-based adhesives that are less than or equal to five (5%) percent by volume of VOCs excluding HAPs.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone (326 IAC 6-3-2).
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP consisting of maintenance welding with manganese compounds of less than five (5%) percent by weight. Indiana Building Systems, LLC uses one (1) pound box of AWS E7014 per six (6) months.
- (h) Woodworking operations = 0.015 pounds per hour PM₁₀, drywall trimming = 0.010 pounds per hour PM₁₀, blown-in attic insulation = 0.97 pounds per hour PM₁₀.

Existing Approvals

The source has been operating under the previous FESOP 039-9757-00489, issued on July 21, 2000, and the following amendments and revisions:

- (a) 1st Reopening 039-13032-00489, issued on September 24, 2001;
- (b) 1st AAF 039-13770-00489, issued on January 29, 2001;
- (c) 2nd AAF 039-15372-00489, issued on April 1, 2002;
- (d) 3rd AAF 039-17122-00489, issued April 22, 2003;
- (e) 4th AAF 039-19213-00489, issued August 31, 2004.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this FESOP. The following terms and conditions from previous approvals have been revised or added in this FESOP:

- (a) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.13 (Preventive Maintenance Plan) and has amended Condition B.14 (Emergency Provisions).
- (b) Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, a new condition, entitled, Credible Evidence, reflecting this rule will be incorporated into Section B of the permit.
- (c) IDEM realizes that the instrument specifications can only be practically applied to analog units, and has therefore clarified Condition C.13 to state that the condition only applies to analog units. IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from Condition C.13.

- (d) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan (Condition C.16) with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.
- (e) All references to the condition entitled, Compliance Response Plan - Preparation, Implementation, Records, and Reports, have been revised to reflect the new condition title, Response to Excursions or Exceedances.
- (f) Condition D.1.3(b) has been revised the combination of HAPs limit to less than 24.5 tons per twelve (12) consecutive month period due to a refinement of the potential HAPs from insignificant activities.
- (g) Condition D.1.4 has been revised to assign PM₁₀ emission limits to each of the baghouses. The limit for the baghouse, identified as BH1, has been revised to 6.30 pounds per hour. The PM₁₀ emissions from the baghouses, identified as BH2, BH3 and BH4, shall be limited to 1.91 pounds per hour each.
- (h) Condition D.1.5(b) has been revised since the maximum process weight rate for the baghouse, identified as BH1, has decreased and the revised allowable PM emission rate will be incorporated into the proposed permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this proposed FESOP:

- (i) Since the requirements of Condition C.6 (Operation of Equipment) have been incorporated in the D Sections, Condition C.6 has been removed from the permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on April 15, 2004. Additional information was received on March 31, May 3, September 16 and November 4, 2005.

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

Emission Calculations

See pages 1 of 8 of Appendix A of this document for detailed emission calculations.

The potential to emit PM and PM₁₀ from the grinding and machining operations in Plant 2 controlled baghouses, identified as BH2, BH3 and BH4, and a design grain loading of less than 0.03

grains per actual cubic foot of exhaust air and a flow rate of less than 4,000 actual cubic feet per minute has been provided by the applicant as a total of 16.4 tons per year based on 8,760 hours of operation. The total potential to emit PM and PM₁₀ after a 98% capture and control efficiency of the baghouses is 0.329 tons per year. However using the actual flow rates and an assumed 0.03 outlet grain loading combined with a control efficiency of 98% yields a total potential to emit of 297 tons per year for the three (3) baghouses as shown on page 5 of 8 of Appendix A. Therefore, the more conservative emission rates before and after controls have been utilized.

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	540
PM ₁₀	540
SO ₂	0.034
VOC	230
CO	4.80
NO _x	5.72

HAPs	Unrestricted Potential Emissions (tons/yr)
Xylene	13.1
Toluene	24.8
Ethylbenzene	2.60
MDI	0.00005
Hexane	0.135
MEK	4.18
Vinyl Acetate	0.283
Perchloroethylene	1.92
Tricchloroethylene	1.28
Ethylene Glycol	1.54
Methylene Chloride	1.49
Dimethylacohexamine	0.660
Insignificant Activities	0.408
Total	52.5

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the

provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

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

Process/Emission Unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating (EU-1) Plants 1 & 2	0.948	0.948	-	<97.5	-	-	<24.5
Process Activities (EU-1) Plant 1 (BH1)	27.6	27.6	-	-	-	-	-
Process Activities (EU-1) Plant 2 (BH2, BH3 & BH4)	25.1	25.1	-	-	-	-	-
Insignificant Activities							
Natural Gas Combustion	0.109	0.434	0.034	0.314	4.80	5.72	0.108
Woodworking	4.36	4.36	-	-	-	-	-
Other Insignificant Activities	13.0	13.0	-	2.19	-	-	0.3
Total Emissions	71.1	71.4	0.034	<100	4.80	5.72	<10/25

- (a) The PM emission rate for the baghouses, identified as BH1, BH2, BH3 and BH4, for Plants 1 and 2 are based on the allowable particulate rate pursuant to 326 IAC 6-3-2 based on the process weight rate of the material processed and controlled by each baghouse as shown on page 5 of 8 of Appendix A. PM₁₀ was assumed to be equal to PM.
- (b) The PM overspray from surface coating operations was assigned the unrestricted potential to emit. PM₁₀ was set equal to PM.

- (c) The total VOC usage in surface coating operations shall be limited to less than 97.5 tons per year including solvents and thinners.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other 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.
- (d) 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	71.1
PM ₁₀	71.4
SO ₂	0.034
VOC	Less Than 100
CO	4.80
NO _x	5.72
Single HAP	Less Than 10
Combination HAPs	Less Than 25

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories and no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ (Wood Furniture Manufacturing Operations) have not been included in this permit since all wood being coated is structural and none of the cabinets are coated by the source. The cabinets are only installed in the modular home manufacturing source. In addition, HAPs are limited below applicability levels of ten (10) and twenty-five (25) tons per year for a single and combination of all HAPs, respectively.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) have not been included in this permit since the HAPs are limited below applicability levels of ten (10) and twenty-five (25) tons per year for a single and combination of all HAPs, respectively.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP (Surface Coating of Plastic Parts and Products) have not been included in this permit since the HAPs are limited below applicability levels of ten (10) and twenty-five (25) tons per year for a single and combination of all HAPs, respectively.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) included in this permit.

State Rule Applicability – Entire Source

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

The source, constructed in the 1990s after the PSD applicability date of August 7, 1977, is a minor PSD source since all attainment criteria pollutants have a potential to emit after enforceable limits and controls of less than two hundred and fifty (250) tons per year.

The PM₁₀ emission limits required to comply with 326 IAC 2-8-4 also make the source minor with respect to PSD.

The combined PM emissions from the cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, controlled by baghouse, identified as BH1, shall be limited to 6.30 pounds per hour. The PM emissions from the grinding and machining operations in factory built housing facility, identified as Plant 2, controlled by baghouses, identified as BH2, BH3 and BH4, shall be limited to 1.91 pounds of PM per hour each also retains the minor source status of Indiana Building Systems, LLC with respect to 326 IAC 2-2, PSD.

The four (4) baghouses, identified as BH1, BH2, BH3 and BH4, must be operated to comply with these limits.

326 IAC 2-3 (Emission Offset)

The source is a minor source with respect to the requirements of 326 IAC 2-3, Emission Offset, since the potential to emit NO_x is less than one hundred (100) tons per year and the source shall comply with the VOC emission limit for EU-1 of less than 97.5 tons per year (see 326 IAC 2-8-4 section). These limits ensure that the source-wide emissions of all nonattainment pollutants are less than one hundred (100) tons per year.

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

The source has agreed to limit a single HAP to less than ten (10) tons per year and the combination of all HAPs to less than twenty-five (25) tons per year from the EU-1 (Plant 1 and Plant 2). See 326 IAC 2-8-4 section. Therefore, the requirements of this rule are not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP Permit Content)

Pursuant to this rule, the PM₁₀ and VOC emissions shall be limited to less than one hundred (100) tons per year.

The combined PM₁₀ emissions from the cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, shall be limited to 6.30 pounds per hour. Baghouse BH1 shall control emissions from the cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, at all times that these processes are in operation in order to comply with this limit.

In addition, the PM₁₀ emissions from the grinding and machining operations in factory built housing facility, identified as Plant 2, exhausted to three (3) baghouses, identified as BH2, BH3 and BH4, shall be limited to 1.91 pounds of PM per hour each. Baghouses BH2, BH3 and BH4 shall control emissions from the grinding and machining operations in factory built housing facility, identified as Plant 2, at all times that these processes are in operation in order to comply with these limits.

VOC delivered to the coating applicators from the factory built housing facilities, identified as Plants 1 and 2, collectively identified as EU-1, shall be limited to less than 97.5 tons per year. These limited emissions in addition to the unrestricted 2.5 tons of VOC per year from insignificant activities limits the entire source to less than one hundred (100) tons of VOC per year.

In addition, the amount of a single HAP delivered to the coating applicators shall be limited to less than ten (10) tons per year and the combination of HAPs delivered to the coating applicators shall be limited to less than twenty-four and five tenths (24.5) tons per year from factory built housing facilities, identified as Plants 1 and 2, collectively identified as EU-1 to ensure that the entire source individual HAP and combined HAPs emissions are less than ten (10) and twenty-five (25) tons per year, respectively.

Compliance with the PM₁₀, VOC and HAPs emission limits renders the requirements of 326 IAC 2-7 not applicable to the entire source.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant 326 IAC 6-3-1(b)(6) and (7), the surface coating operations, using roll and flow coating applicators, are exempt from the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes using spray applicators shall be controlled by a tarp and the Permittee shall keep the tarp in place at all times when spray applicators are in use.

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

- (a) Plant 1

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Plant 1 construction and assembly operations controlled by a baghouse, identified as BH1, shall not exceed 6.30 pounds per hour when operating at a process weight rate of 1.90 tons per hour.

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

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

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

The baghouse, identified as BH1 shall be in operation at all times the associated equipment (floor substrate to steel frame, fixture assembly, wall construction and assembly,

ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment), is in operation in order to comply with this limit.

As shown on page 5 of 8 of Appendix A, the cutting, sawing and grinding operations in factory built housing facility, identified as Plant 1, controlled by baghouse, identified as BH1, have a potential to emit after controls of 1.03 pounds per hour which complies with the allowable particulate rate of 6.30 pounds per hour.

(b) Plant 2

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Plant 2 grinding and machining operations controlled by baghouses, identified as BH2, BH3 and BH4, shall each not exceed 1.91 pounds per hour when each is operating at a process weight rate of 0.320 tons per hour.

The pound per hour limitations were calculated with the following equation:

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

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

The baghouses, identified as BH2, BH3, and BH4 shall be in operation at all times grinding and machining operations are in operation in order to comply with this limit.

As shown on page 5 of 8 of Appendix A, the grinding and machining operations in factory built housing facility, identified as Plant 2, controlled by baghouses, identified as BH2, BH3 and BH4 have individual potential to emit after controls of 0.701, 0.489 and 0.167 pounds per hour, respectively, which all comply with the allowable particulate rate of 1.91 pounds per hour each.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Pursuant to F 039-9757-000489 issued on July 21, 2000, Best Available Control Technology (BACT) for the surface coating operations was determined to be material substitution which limits the VOC delivered to the applicators to 218.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month from Plants 1 and 2, identified as EU-1, with a maximum VOC content of any coating of 7.16 pounds of VOC per gallon of coating less water.

The following management and work practices shall apply:

- (a) Operator training course.
- (b) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.
- (c) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.
- (d) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.

- (e) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (f) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spillage on the floor.
- (g) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.
- (h) Odd lot/batch overrun coatings will be reused as much as possible to reduce hazardous waste and the related impact on the environment.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

This modular home manufacturing source is not subject to the requirements of this rule since all wood and wood components being coated are structural and do not meet the definition of furniture specified in the rule. All cabinets are surface coated prior to shipment to Indiana Building Systems, LLC and then installed into the modular homes. Therefore, since there are no other Article 8 rules applicable to this source, this source is subject to the requirements of 326 IAC 8-1-6.

State Rule Applicability – Insignificant Activities

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

- (a) Maintenance Welding

The maintenance welding which uses one (1) pound box of AWS E7014 per six (6) months is exempt from the requirements of 326 IAC 6-3-2 pursuant to 326 IAC 6-3-1(b)(9) since less than 625 pounds of wire or rod are consumed per day.

- (b) Woodworking, Drywall Trimming and blow-in Attic Insulation

The woodworking, drywall trimming and the blown-in attic insulation operations are all exempt from the requirements of 326 IAC 6-3-2 pursuant to 326 IAC 6-1(a)(14) due to their potential to emit being less than 0.551 pounds per hour of particulate.

- (c) Trimmers

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimmers shall not exceed the emission rate determined 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:

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

Testing Requirements

PM testing of the baghouse, identified as BH1, in Plant 1 is proposed. PM₁₀ testing is not proposed since these processes should not have any PM₁₀ condensibles and therefore PM₁₀ emis-

sions could not exceed PM emissions. No testing is proposed for the other three (3) baghouses, identified as BH2, BH3 and BH4 in Plant 2.

No testing is proposed for the surface coating operations since the VOC and HAPs emissions are based on the MSDS information for each coating/solvent material.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The factory built housing facilities, identified as Plants 1 and 2, identified as EU-1, have applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of the factory built housing baghouse BH1, BH2, BH3 and BH4 exhausts shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the baghouses, identified as BH1, BH2, BH3 and BH4, used in conjunction with the construction and/or assembly operations in Plant 1 and the grinding and machining operations in Plant 2 at least once per day when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance

with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months
- (d) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (e) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

- (f) Daily inspections shall be performed to verify the placement, integrity and particle loading of the tarps. To monitor the performance of the tarps, weekly observations shall be made of the overspray from the surface coating while surface coating processes are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (g) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the baghouse, identified as BH1, utilized with the construction and/or assembly operations in Plant 1, baghouses, identified as BH2, BH3 and BH4, utilized with the grinding and machining operations in Plant 2 and the tarp for surface coating processes must operate properly to ensure compliance with 326 IAC 2-2, 326 IAC 5-1 326 IAC 6-3-2, and 326 IAC 2-8.

Conclusion

The operation of this stationary modular home manufacturing source shall be subject to the conditions of the **FESOP 039-18977-00489**.

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

**Company Name: Indiana Building Systems, LLC
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-18977
Plt ID: 039-00489
Reviewer: Mark L Kramer
Application Date: April 15, 2004**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (units/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
GV 3 - 12																	
BPK 200 120440	7.29	73.81%	0.00%	73.81%	0.00%	3.70%	0.083	3.000	100.00%	5.38	5.38	1.34	32.16	5.87	0.00	145.43	100.00%
INSTA-SHINE 458	8.00	78.11%	60.10%	18.01%	57.70%	82.00%	0.080	3.000	100.00%	3.41	1.44	0.35	8.30	1.51	0.00	1.76	100.00%
FOAMSEAL F2100A	10.33	50.00%	0.00%	50.00%	0.00%	0.00%	0.564	3.000	0.0001%	5.17	5.17	0.00	0.00	0.00	0.00	N/A	100.00%
FOAMSEAL F2100	8.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.580	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100.00%
SHEARWALL E-72 ADHESIVE 244683	9.00	36.13%	0.00%	36.13%	0.00%	50.50%	1.872	3.000	100.00%	3.25	3.25	18.26	438.28	79.99	0.00	6.44	100.00%
CLEANER & DEGREASER FCC002290	5.86	99.76%	0.00%	99.76%	0.00%	0.00%	0.006	3.000	100.00%	5.85	5.85	0.11	2.53	0.46	0.00	N/A	100.00%
LAP CEMENT	8.58	25.18%	0.00%	25.18%	0.00%	74.70%	3.099	3.000	100.00%	2.16	2.16	20.09	482.06	87.98	0.00	2.89	100.00%
MINERAL SPIRITS R10700	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.059	3.000	100.00%	6.58	6.58	1.16	27.95	5.10	0.00	N/A	100.00%
JOINT FILLER A30410	10.19	6.20%	0.00%	6.20%	0.00%	91.20%	2.154	3.000	100.00%	0.63	0.63	4.08	97.98	17.88	0.00	0.69	100.00%
LATEX CAULK 73-931	11.83	8.45%	0.00%	8.45%	0.00%	0.00%	0.165	3.000	100.00%	1.00	1.00	0.49	11.88	2.17	0.00	N/A	100.00%
DAP QUICK SEAL 18001	12.06	36.49%	32.00%	4.49%	46.35%	53.65%	0.033	3.000	100.00%	1.01	0.54	0.05	1.29	0.23	0.00	1.01	100.00%
DAP SILICONE CAULK	8.52	5.00%	0.00%	5.00%	0.00%	97.00%	0.081	3.000	100.00%	0.43	0.43	0.10	2.48	0.45	0.00	0.44	100.00%
ABS CEMENT 30889	7.08	76.50%	0.00%	76.50%	0.00%	35.00%	0.054	3.000	100.00%	5.42	5.42	0.88	21.06	3.84	0.00	15.47	100.00%
#41 GREEN FLOOR SEALER 41-XX	8.60	79.00%	79.00%	0.00%	81.56%	21.00%	0.090	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PREAD-MOR RE-BOND LATEX ADHESIVE 92	8.00	50.75%	47.00%	3.75%	45.14%	60.00%	0.126	3.000	100.00%	0.55	0.30	0.11	2.72	0.50	0.00	0.50	100.00%
TANNER MB 46 XA-2675	9.50	67.00%	66.70%	0.30%	76.07%	23.60%	3.788	3.000	100.00%	0.12	0.03	0.32	7.77	1.42	0.00	0.12	100.00%
GRUNDY'S SURFACE CEMENT	9.26	27.04%	0.00%	27.04%	0.00%	70.00%	0.407	3.000	100.00%	2.50	2.50	3.06	73.37	13.39	0.00	3.58	100.00%
PERMATHANE SM7100	13.32	3.00%	0.00%	3.00%	0.00%	3.00%	0.137	3.000	100.00%	0.40	0.40	0.16	3.94	0.72	0.00	13.32	100.00%
STAYPUT IV SPRAY ADHESIVE	7.58	85.00%	0.00%	85.00%	0.00%	23.00%	0.006	3.000	100.00%	6.44	6.44	0.12	2.78	0.51	0.00	28.01	100.00%
MANUS SEAL 27A	8.17	25.50%	0.00%	25.50%	0.00%	58.00%	0.037	3.000	100.00%	2.08	2.08	0.23	5.55	1.01	0.00	3.59	100.00%
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.00%	0.00%	0.00%	0.00%	77.50%	0.019	3.000	0.0001%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PVC CLEANER 30776	6.61	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	3.000	100.00%	6.61	6.61	0.08	1.90	0.35	0.00	N/A	100.00%
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	40.02%	0.00%	40.02%	0.00%	65.20%	0.004	3.000	100.00%	4.10	4.10	0.05	1.18	0.22	0.0808	6.29	75.00%
CYCLO BRAKE & PARTS CLEANER C-32	12.00	28.00%	0.00%	28.00%	0.00%	0.00%	0.027	3.000	100.00%	3.36	3.36	0.27	6.53	1.19	0.7663	N/A	75.00%
CYCLO SILICONE SPRAY C-33	5.91	91.75%	0.00%	91.75%	0.00%	5.34%	0.015	3.000	100.00%	5.42	5.42	0.24	5.86	1.07	0.0240	101.54	75.00%
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	80.00%	0.00%	80.00%	0.00%	60.00%	0.004	3.000	100.00%	5.33	5.33	0.06	1.53	0.28	0.0175	8.88	75.00%
CYCLO BRAKE AWAY C-10	7.46	96.00%	0.00%	96.00%	0.00%	4.00%	0.005	3.000	100.00%	7.16	7.16	0.11	2.58	0.47	0.0049	179.04	75.00%
DAP SPRAY-N-GO ALL COLORS	6.66	72.53%	0.00%	72.53%	0.00%	15.00%	0.009	3.000	100.00%	4.83	4.83	0.13	3.13	0.57	0.0541	32.20	75.00%

PM Control Efficiency: 50.00%

**State Potential Emissions
METHODOLOGY**

**Uncontrolled
Controlled**

51.9	1245	227	0.948
51.9	1245	227	0.474

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) * Flash-off

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

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) * Flash-off

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) * Flash-off

Total = Worst Coating + Sum of all solvents used

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

**Company Name: Indiana Building Systems, LLC
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-18977
Plt ID: 039-00489
Reviewer: Mark L Kramer
Application Date: April 15, 2004**

BACT Analysis with Material Substitution

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (units/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
GV 3 - 12																	
BPK 200 120440	7.29	73.81%	0.00%	73.81%	0.00%	3.70%	0.083	3.000	100.00%	5.38	5.38	1.34	32.16	5.87	0.00	145.43	100.00%
INSTA-SHINE 458	8.00	78.11%	60.10%	18.01%	57.70%	82.00%	0.080	3.000	100.00%	3.41	1.44	0.35	8.30	1.51	0.00	1.76	100.00%
FOAMSEAL F2100A	10.33	50.00%	0.00%	50.00%	0.00%	0.00%	0.564	3.000	0.0001%	5.17	5.17	0.00	0.00	0.00	0.00	N/A	100.00%
FOAMSEAL F2100	8.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.580	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100.00%
SHEARWALL E-72 ADHESIVE 244683	9.00	36.13%	0.00%	36.13%	0.00%	50.50%	1.872	3.000	100.00%	3.25	3.25	18.26	438.28	79.99	0.00	6.44	100.00%
CLEANER & DEGREASER FCC002290	5.86	99.76%	0.00%	99.76%	0.00%	0.00%	0.006	3.000	100.00%	5.85	5.85	0.11	2.53	0.46	0.00	N/A	100.00%
LAP CEMENT	8.15	24.00%	0.00%	24.00%	0.00%	70.10%	3.099	3.000	100.00%	1.96	1.96	18.18	436.44	79.65	0.00	2.79	100.00%
MINERAL SPIRITS R10700	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.059	3.000	100.00%	6.58	6.58	1.16	27.95	5.10	0.00	N/A	100.00%
JOINT FILLER A30410	10.19	6.20%	0.00%	6.20%	0.00%	91.20%	2.154	3.000	100.00%	0.63	0.63	4.08	97.98	17.88	0.00	0.69	100.00%
LATEX CAULK 73-931	11.83	8.45%	0.00%	8.45%	0.00%	0.00%	0.165	3.000	100.00%	1.00	1.00	0.49	11.88	2.17	0.00	N/A	100.00%
DAP QUICK SEAL 18001	12.06	36.49%	32.00%	4.49%	46.35%	53.65%	0.033	3.000	100.00%	1.01	0.54	0.05	1.29	0.23	0.00	1.01	100.00%
DAP SILICONE CAULK	8.52	5.00%	0.00%	5.00%	0.00%	97.00%	0.081	3.000	100.00%	0.43	0.43	0.10	2.48	0.45	0.00	0.44	100.00%
ABS CEMENT 30889	7.08	76.50%	0.00%	76.50%	0.00%	35.00%	0.054	3.000	100.00%	5.42	5.42	0.88	21.06	3.84	0.00	15.47	100.00%
#41 GREEN FLOOR SEALER 41-XX	8.60	79.00%	79.00%	0.00%	81.56%	21.00%	0.090	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PREAD-MOR RE-BOND LATEX ADHESIVE 92	8.00	50.75%	47.00%	3.75%	45.14%	60.00%	0.126	3.000	100.00%	0.55	0.30	0.11	2.72	0.50	0.00	0.50	100.00%
TANNER MB 46 XA-2675	9.50	67.00%	66.70%	0.30%	76.07%	23.60%	3.788	3.000	100.00%	0.12	0.03	0.32	7.77	1.42	0.00	0.12	100.00%
GRUNDY'S SURFACE CEMENT	9.17	27.04%	0.00%	27.04%	0.00%	70.00%	0.407	3.000	100.00%	2.48	2.48	3.03	72.66	13.26	0.00	3.54	100.00%
PERMATHANE SM7100	13.32	3.00%	0.00%	3.00%	0.00%	3.00%	0.137	3.000	100.00%	0.40	0.40	0.16	3.94	0.72	0.00	13.32	100.00%
STAYPUT IV SPRAY ADHESIVE	7.58	85.00%	0.00%	85.00%	0.00%	23.00%	0.006	3.000	100.00%	6.44	6.44	0.12	2.78	0.51	0.00	28.01	100.00%
MANUS SEAL 27A	8.17	25.50%	0.00%	25.50%	0.00%	58.00%	0.037	3.000	100.00%	2.08	2.08	0.23	5.55	1.01	0.00	3.59	100.00%
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.00%	0.00%	0.00%	0.00%	77.50%	0.019	3.000	0.0001%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PVC CLEANER 30776	6.61	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	3.000	100.00%	6.61	6.61	0.08	1.90	0.35	0.00	N/A	100.00%
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	40.02%	0.00%	40.02%	0.00%	65.20%	0.004	3.000	100.00%	4.10	4.10	0.05	1.18	0.22	0.0808	6.29	75.00%
CYCLO BRAKE & PARTS CLEANER C-32	12.00	28.00%	0.00%	28.00%	0.00%	0.00%	0.027	3.000	100.00%	3.36	3.36	0.27	6.53	1.19	0.7663	N/A	75.00%
CYCLO SILICONE SPRAY C-33	5.91	91.75%	0.00%	91.75%	0.00%	5.34%	0.015	3.000	100.00%	5.42	5.42	0.24	5.86	1.07	0.0240	101.54	75.00%
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	80.00%	0.00%	80.00%	0.00%	60.00%	0.004	3.000	100.00%	5.33	5.33	0.06	1.53	0.28	0.0175	8.88	75.00%
CYCLO BRAKE AWAY C-10	7.46	96.00%	0.00%	96.00%	0.00%	4.00%	0.005	3.000	100.00%	7.16	7.16	0.11	2.58	0.47	0.0049	179.04	75.00%
DAP SPRAY-N-GO ALL COLORS	6.66	72.53%	0.00%	72.53%	0.00%	15.00%	0.009	3.000	100.00%	4.83	4.83	0.13	3.13	0.57	0.0541	32.20	75.00%

PM Control Efficiency: 50%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled
Controlled

49.9	1198	219	0.948
49.9	1198	219	0.474

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) * Flash-off

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

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) * Flash-off

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) * Flash-off

Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Indiana Building Systems, LLC
 Plant Location: 51700 Lovejoy Drive, Middlebury, Indiana 46540
 FESOP : F 039-18977
 Pit ID: 039-00489
 County: Elkhart
 Permit Reviewer: Mark L Kramer
 Application Date: April 15, 2004

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % MDI	Weight % Hexane	Weight % MEK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MDI Emissions (tons/yr)	Hexane Emissions (tons/yr)	MEK Emissions (tons/yr)
GV 3 - 12																
BPK 200 120440	7.29	0.083	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
INSTA-SHINE 458	8.00	0.080	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
FOAMSEAL F2100A	10.33	0.564	3.00	0.0001%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00	0.00	0.00	0.00004	0.00	0.00
FOAMSEAL F2100	8.66	0.580	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
SHEARWALL E-72 ADHESIVE 244683	9.00	1.872	3.00	100.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	22.14	0.00	0.00000	0.00	0.00
CLEANER & DEGREASER FCC002290	5.86	0.006	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
LAP CEMENT	8.15	3.099	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
MINERAL SPIRITS R10700	6.58	0.059	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
JOINT FILLER A30410	10.19	2.154	3.00	100.00%	4.10%	0.60%	0.90%	0.00%	0.00%	0.00%	11.82	1.73	2.60	0.00000	0.00	0.00
LATEX CAULK 73-931	11.83	0.165	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP QUICK SEAL 18001	12.06	0.033	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP SILICONE CAULK	8.52	0.081	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
ABS CEMENT 30889	7.08	0.054	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	75.00%	0.00	0.00	0.00	0.00000	0.00	3.77
#41 GREEN FLOOR SEALER 41-XX	8.60	0.090	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
SPREADMORE REBOND LATEX ADHESIVE 924	8.00	0.126	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
TANNER MB 46 XA-2675	9.50	3.788	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
GRUNDY'S SURFACE CEMENT	9.17	0.407	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
PERMATHANE SM7100	13.32	0.137	3.00	100.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.72	0.00	0.00000	0.00	0.00
STAYPUT IV SPRAY ADHESIVE	7.58	0.006	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
MANUS SEAL 27A	8.17	0.037	3.00	100.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.19	0.00	0.00	0.00000	0.00	0.00
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.019	3.00	0.0001%	0.00%	0.00%	0.00%	60.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
PVC CLEANER 30776	6.61	0.004	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	95.00%	0.00	0.00	0.00	0.00000	0.00	0.33
MAINTENANCE																
SAFETY YELLOW 70103HC	10.25	0.004	3.00	100.00%	15.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08	0.00	0.00	0.00000	0.00	0.00
CYCLO BRAKE & PARTS CLEANER C-32	12.00	0.027	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
CYCLO SILICONE SPRAY C-33	5.91	0.015	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	0.004	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	37.00%	0.00%	0.00	0.00	0.00	0.00000	0.13	0.00
CYCLO BRAKE AWAY C-10	7.46	0.005	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP SPRAY-N-GO ALL COLORS 511XX	6.66	0.009	3.00	100.00%	5.00%	20.00%	0.00%	0.00%	0.00%	10.00%	0.04	0.16	0.00	0.00000	0.00	0.08

SUBTOTALS	(tons/yr):	13.14	24.75	2.60	0.00004	0.130	4.18
	(lbs/hr):	3.000	5.650	0.593	0.00001	0.030	0.954
	(g/sec):	0.378	0.712	0.075	0.00000	0.004	0.120

Total State Potential Emissions

METHODOLOGY

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

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Vinyl Acetate	Weight % Perchloroethylene	Weight % Trichloroethylene	Weight % Ethylene Glycol	Weight % Methylenechloride	Weight % Dimethyla-cyclohex-lamine	Vinyl Acetate Emissions (tons/yr)	Perchloro-ethylene Emissions (tons/yr)	Trichloro-ethylene Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Methylene-chloride Emissions (tons/yr)	Dimethyla-cyclohex-lamine Emissions (tons/yr)	Total HAP Emissions (tons/yr)
GV 3 - 12																	
BPK 200 120440	7.29	0.083	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTA-SHINE 458	8.00	0.080	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FOAMSEAL F2100A	10.33	0.564	3.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FOAMSEAL F2100	8.66	0.580	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.66	0.66
SHEARWALL E-72 ADHESIVE 244683	9.00	1.872	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	22.14
CLEANER & DEGREASER FCC002290	5.86	0.006	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LAP CEMENT	8.15	3.099	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MINERAL SPIRITS R10700	6.58	0.059	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
JOINT FILLER A30410	10.19	2.154	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	16.15
LATEX CAULK 73-931	11.83	0.165	3.00	1.00	1.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.26	0.00	0.00	1.28	0.00	0.00	1.54
DAP QUICK SEAL 18001	12.06	0.033	3.00	1.00	0.50%	0.00%	0.00%	5.00%	0.00%	0.00%	0.03	0.00	0.00	0.26	0.00	0.00	0.29
DAP SILICONE CAULK	8.52	0.081	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS CEMENT 30889	7.08	0.054	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	3.77
#41 GREEN FLOOR SEALER 41-XX	8.60	0.090	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPREADMORE REBOND LATEX ADHESIVE 924	8.00	0.126	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TANNER MB 46 XA-2675	9.50	3.788	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GRUNDY'S SURFACE CEMENT	9.17	0.407	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PERMATHANE SM7100	13.32	0.137	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.72
STAYPUT IV SPRAY ADHESIVE	7.58	0.006	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MANUS SEAL 27A	8.17	0.037	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	1.19
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.019	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PVC CLEANER 30776	6.61	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.33
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.08
CYCLO BRAKE & PARTS CLEANER C-32	12.00	0.027	3.00	1.00	0.00%	45.00%	30.00%	0.00%	35.00%	0.00%	0.00	1.92	1.28	0.00	1.49	0.00	4.68
CYCLO SILICONE SPRAY C-33	5.91	0.015	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.13
CYCLO BRAKE AWAY C-10	7.46	0.005	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DAP SPRAY-N-GO ALL COLORS 511XX	6.66	0.009	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.28

				Lead Comp.	Lead
SAFETY YELLOW 70103HC	10.25	0.004	3.00	1.00	19.34%

Total State Potential Emissions

SUBTOTALS	(tons/yr):		0.283	1.92	1.277	1.54	1.490	0.660
	(lbs/hr):		0.065	0.437	0.292	0.352	0.340	0.151
	(g/sec):		0.008	0.055	0.037	0.044	0.043	0.019

METHODOLOGY

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

TOTAL	(tons/yr):	52.1
	(lbs/hr):	11.89
	(g/sec):	1.50

**Appendix A: Emission Calculations
Baghouse Operations**

Company Name: Indiana Building Systems, LLC
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP: F 039-18977
Plt ID: 039-00489
Reviewer: Mark L Kramer
Application Date: April 15, 2004

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
Plant 1							
BH1	98.0%	0.015	8000.0	51.4	225.26	1.029	4.51
Plant 2							
BH2	98.0%	0.030	2725.0	35.0	153.46	0.701	3.07
BH3	98.0%	0.030	1900.0	24.4	107.00	0.489	2.14
BH4	98.0%	0.030	650.0	8.4	36.60	0.167	0.73
			Total	Plant 2	297.1		5.94

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

		Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
Plant 1	BH1	3800	1.90	6.30
Plant 2	BH2	640	0.32	1.91
Plant 2	BH3	640	0.32	1.91
Plant 2	BH4	640	0.32	1.91

Methodology

Allowable Emissions = $4.10(\text{Process Weight Rate})^{0.67}$

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

Company Name: Indiana Building Systems, LLC
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP: F 039-18977
Pit ID: 039-00489
Reviewer: Mark L Kramer
Application Date: April 15, 2004

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0001	0.0001	0.0043	0.1029	0.0002

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	0.00003	0.0001	0.0001	0.00002	0.0001	0.108

Methodology is the same as page 6.

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

Company Name: Indiana Building Systems, LLC
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-18977
Plt ID: 039-00489
Reviewer: Mark L Kramer
Application Date: April 15, 2004

Summary of Emissions

Significant Emission Unit	Uncontrolled Potential Emissions							
	PM	PM-10	SO2	NOx	VOC	CO	Lead	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
EU-1								
Surface Coating								
Plants 1 & 2	0.948	0.000	0.000	0.000	227	0.000	0.000	52.1
Process Activities								
Plant 1 (BH1)	225	225	0.000	0.000	0.000	0.000	0.000	0.000
Plant 2 (BH2, BH3 & BH4)	297	297	0.000	0.000	0.000	0.000	0.000	0.000
Subtotal Significant Emission Unit	522	522	0.000	0.000	0.000	0.000	0.000	0.000
Insignificant Activities								
Natural Gas Combustion	0.109	0.434	0.034	5.72	0.314	4.800	0.00003	0.108
Woodworking	4.36	4.36	0.000	0.000	0.000	0.000	0.000	0.000
Other Insignificant Activities	13.0	13.0	0.000	0.000	2.19	0.000	0.00000	0.300
Subtotal Insignificant Activities	17.5	17.8	0.034	5.72	2.50	4.80	0.000	0.408
Total	540	540	0.034	5.720	230	4.80	0.000	52.5

Significant Emission Unit	Controlled Potential Emissions							
	PM	PM-10	SO2	NOx	VOC	CO	Lead	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
EU-1								
Surface Coating								
Plants 1 & 2	0.474	0.474	0.000	0.000	227	0.000	0.000	52.1
Process Activities								
Plant 1 (BH1)	4.51	4.51	0.000	0.000	0.000	0.000	0.000	0.000
Plant 2 (BH2, BH3 & BH4)	5.94	5.94	0.000	0.000	0.000	0.000	0.000	0.000
Subtotal Significant Emission Unit	10.45	10.45	0.000	0.000	0.000	0.000	0.000	0.000
Insignificant Activities								
Natural Gas Combustion	0.109	0.434	0.034	5.720	0.314	4.800	0.000	0.108
Woodworking	4.36	4.36	0.000	0.000	0.000	0.000	0.000	0.000
Other Insignificant Activities	13.0	13.0	0.000	0.000	2.19	0.000	0.000	0.300
Subtotal Insignificant Activities	17.5	17.8	0.034	5.72	2.50	4.80	0.000	0.408
Total	28.4	28.7	0.034	5.720	230	4.80	0.000	52.5

Significant Emission Unit	Limited & Controlled Potential Emissions							
	PM	PM-10	SO2	NOx	VOC	CO	Lead	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
EU-1								
Surface Coating								
Plants 1 & 2	0.948	0.948	0.000	0.000	<97.5	0.000	0.000	24.5
Process Activities								
Plant 1 (BH1)	27.6	27.6	0.000	0.000	0.000	0.000	0.000	0.000
Plant 2 (BH2, BH3 & BH4)	25.1	25.1	0.000	0.000	0.000	0.000	0.000	0.000
Subtotal Significant Emission Unit	52.7	52.7	0.000	0.000	0.000	0.000	0.000	0.000
Insignificant Activities								
Natural Gas Combustion	0.109	0.434	0.034	5.72	0.314	4.800	0.000	0.108
Woodworking	4.36	4.36	0.000	0.000	0.000	0.000	0.000	0.000
Other Insignificant Activities	13.0	13.0	0.000	0.000	2.19	0.000	0.000	0.300
Subtotal Insignificant Activities	17.5	17.8	0.034	5.72	2.50	4.80	0.000	0.408
Total	71.1	71.4	0.034	5.72	<100	4.80	0.000	<25