



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 3, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Damon Corporation / 039-19533-00407

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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November 3, 2004

Mr. David Everett
Damon Corporation
P.O.Box 2888,
Elkhart, IN 46515-2888

Re: 039-19533-00407
First Administrative Amendment to
FESOP 039-17521-00407

Dear Mr. Everett:

Damon Corporation was issued a Federally Enforceable State Operation Permit (FESOP) on December 18, 2003 for a stationary motor home manufacturing operation. A letter requesting changes to this permit was received on August 30, 2004. Pursuant to the provisions of 2-8-11.1 the permit is hereby administratively amended as follows.

The Permittee has requested to add a new plant, to be identified as Plant 14. The new Plant 14 will consist of operations for building soft upholstery valences and countertops build-ups. Two miter box power saws that will be moved from Plant 9, and one (1) new table saw, one (1) new EME stationary router, one (1) new belt sander and two (2) new portable dust collectors. The process weight rate of each of one (1) table saw, one (1) belt sander and the one (1) EME stationary router is 60 pounds per hour. These changes will increase by less than 0.1 pounds per hour the potential to emit PM and PM₁₀ from each of the new units and will not trigger any additional Federal or State rules that are applicable to the source.

Pursuant to 326 IAC 2-8-11.1, this permit has been administratively amended as follows:

1. Title page

The title page has been revised to include the address of the location the new Plant 14. Likewise the header has been revised to include Plant 14 as follows (please see next two pages):



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

**Damon Corporation Plants 1, 2, 3, 9, and 14
52570 Paul, 2929 and 2850 Gateway Drive
Elkhart, Indiana 46515**

(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.: F039-17521-00407	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 18, 2003 Expiration Date: December 18, 2008

First Administrative Amendment 039-19533-00407 Pages affected: 7, 8, 8a, 9 and 50	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

2. Section A

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 motor home manufacturing operation.

Authorized individual:	President
Source Address:	52570 Paul, 2929 and 2850 Gateway Drive, Elkhart, Indiana 46514
Mailing Address:	P.O. Box 2888, Elkhart, IN 46515-2888
General Source Phone:	(574) -266-0924
SIC Code:	3792
Source Location Status:	Elkhart
	Attainment for all criteria pollutants Attainment for 1-hour Ozone Basic Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR ; 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 stationary motor home manufacturing operation consists of five (5) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514; ~~and~~
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514; **and**
- (c) **Plant 14 to be located at 2850 Gateway Drive Elkhart, IN 46514.**

The following are reasons why OAQ combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.

The new Plant 14 processes products from Plant 9 consists of operations for building soft upholstery valences and countertop build-ups.

- (b) Plants 1, 2, 3, ~~and~~ 9 **and 14** share the same SIC code, which is 3792.
- (c) Plants 1, 2, 3, ~~and~~ 9 **and 14** are all owned by the same company.

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) Space heaters, process heaters, or boilers using the following fuels:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.

The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.

- (l) Paved and unpaved roads and parking lots with public access
- (m) **Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.**
- (n) **Cutting equipment for cutting composite counter tops located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) EME stationary router, and one (1) belt sanders, and using two (2) portable dust collectors for control.**

3. Section D.12

SECTION D.12 FACILITY OPERATION CONDITIONS

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

- (a) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (b) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (c) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (d) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (e) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (f) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (g) **Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.**
- (h) **Cutting equipment for cutting composite counter tops located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, two (2) miter box power saws, one (1) Table Saw, and one (1) EME stationary router, and one (1) belt sanders, and using two (2) portable dust collectors for control.**

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

Pursuant to T039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the woodworking shop at Plant 1, the woodworking equipment at Plant 2, the woodworking equipment at Plant 3, **the woodworking activities and cutting equipment in Plant 14**, the window routers, and the metal inert gas welders shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Femi Ogunsola/EVP, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (973) 575-2555, press 0 and ask for Femi Ogunsola or extension 3241.

Sincerely,

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

Attachments (FO/EVP)

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michelle Boner



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**Damon Corporation Plants 1, 2, 3, 9, and 14
52570 Paul, 2929 and 2850 Gateway Drive
Elkhart, Indiana 46515**

(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.: F039-17521-00407	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 18, 2003 Expiration Date: December 18, 2008
First Administrative Amendment 039-19533-00407 Pages affected: 7, 8, 8a, 9 and 50	
Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 3, 2004

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 motor home manufacturing operation.

Authorized individual:	President
Source Address:	52570 Paul, 2929 and 2850 Gateway Drive, Elkhart, Indiana 46514
Mailing Address:	P.O. Box 2888, Elkhart, IN 46515-2888
General Source Phone:	(574) -266-0924
SIC Code:	3792
Source Location Status:	Elkhart
	Attainment for 1-hour Ozone Basic Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR; 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 stationary motor home manufacturing operation consists of five (5) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514;
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514; and
- (c) Plant 14 to be located at 2850 Gateway Drive Elkhart, IN 46514

The following are reasons why OAQ combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.

The new Plant 14 processes products from Plant 9 consists of operations for building soft upholstery valences and countertop build-ups.

- (b) Plants 1, 2, 3, 9 and 14 share the same SIC code, which is 3792.
- (c) Plants 1, 2, 3, 9 and 14 are all owned by the same company.

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

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

The following equipment is located in Plants 1, 2, and 3.

- (a) One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.
- (b) One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.
- (c) One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels method of application is flow coating, and exhausting to ventilation fans E5 and E6.
- (d) One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.
- (e) One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.

The following equipment is located in Plant 9.

- (f) One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.
- (g) One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.
- (h) One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.
- (i) One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.
- (j) A woodworking shop located in plant 9, using a cyclone and a baghouse for control. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

The exhaust fans E1, E2, and E3 at plant 9 are separate and different from ventilation fans E1, E2, and E3 at plants 1, 2, and 3.

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) Space heaters, process heaters, or boilers using the following fuels:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.

- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.

The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.

- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.

- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.

- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.

- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.

- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.

- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.

- (l) Paved and unpaved roads and parking lots with public access.

- (m) Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.

- (n) Cutting equipment for cutting composite counter tops located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) EME stationary router, and one (1) belt sanders, and using two (2) portable dust collectors for control.

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 transition to 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 D.12 FACILITY OPERATION CONDITIONS

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

- (a) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (b) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (c) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (d) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (e) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (f) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (g) Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.
- (h) Cutting equipment for cutting composite counter tops located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) EME stationary router, and one (1) belt sanders, and using two (2) portable dust collectors for control.

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

Pursuant to T039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the woodworking shop at Plant 1, the woodworking equipment at Plant 2, the woodworking equipment at Plant 3, the woodworking activities and cutting equipment in Plant 14, the window routers, and the metal inert gas welders shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

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

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

Source Background and Description

Source Name:	Damon Corporation
Source Location:	52570 Paul, 2929 and 2850 Gateway Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	039-17521-00407
Operation Permit Issuance Date:	December 18, 2003.
Permit Revision No.:	039-19533
Permit Reviewer:	Femi Ogunsola/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Damon Corporation relating to the operation of a stationary motor home manufacturing plant.

History

On August 30, 2004, the Office of Air Quality (OAQ) received a letter informing OAQ of a proposal to add a new plant, to be identified as Plant 14 and requesting minor permit revisions to existing FESOP 039-17521-00407, issued on December 18, 2003.

There will be no change to the unrestricted potential to emit of any regulated pollutant, or to the source's applicability to any Federal or State Rule as stated in FESOP 039-17521-00407, due to the revisions. Pursuant to 326 IAC 2-8-11.1(d)(1), the application is reviewed as a minor permit revision to existing FESOP.

This Technical Support Document reflects the changes consisting of the addition of Plant 14 to the source and revisions to the compliance requirements in FESOP 039-17521-00407 as follows:

Source Definition

This Source Definition from the previous FESOP was incorporated into this permit as follows:

This stationary motor home manufacturing operation consists of four (4) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514; and
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514.
- (c) **Plant 14 to be located at 2850 Gateway Drive Elkhart, IN 46514**

The following are reasons why OAQ has combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.

The new Plant 14 will house some sub-assembly operations consisting of building soft upholstery valences and two miter box power saws that will be moved from Plant 9, counter top build-ups, one (1) table saw, one (1) belt sander and two (2) portable dust collectors. These changes will not increase the potential to emit from the source and will not trigger any additional Federal or State rules that are applicable to the source.

- (b) Plants 1, 2, 3, 9 and 14 share the same SIC code which is 3792.
- (c) Plants 1, 2, 3, 9 and 14 are all owned by the same company.

Permitted Emission Units and Pollution Control Equipment

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

The following equipment is located in Plants 1, 2, and 3.

- (a) One (1) coating booth, identified as Chassis Prep Frame Coating, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.
- (b) One (1) coating facility, identified as Chassis Prep Assembly, coating plastic pipes and boxes, method of application is hand/flow and aerosol, and exhausting to ventilation fans E1, E2, and E3.
- (c) One (1) coating facility, identified as Sidewall and Roof Lamination, coating metal and wood frames and wood panels method of application is flow coating, and exhausting to ventilation fans E5 and E6.
- (d) One (1) coating facility, identified as Baggage Door Assembly, coating wood/fiberglass doors, method of application is flow coating and hand, and exhausting to ventilation fans E9 and E10.
- (e) One (1) coating facility, identified as Floor Lamination, coating metal flooring, method of application is flow coating and hand, and exhausting to ventilation fans E7 and E8.

The following equipment is located in Plant 9.

- (f) One coating facility, identified as Wood Furniture Coating, coating wood furniture, method of application is airless, air assisted spray, and hot melt strips, exhausting to exhaust fans E1 and E2. All wood furniture produced are part of the vehicles produced.
- (g) One (1) coating assembly line, identified as Plant 9 Assembly, coating mostly plastic and wood parts of recreational vehicles as they are assembled, method of application is airless, air assisted spray, flow, and hand, exhausting to exhaust fans E1 and E2.
- (h) One (1) coating booth, identified as Undercoating, coating recreational vehicles, method of application is low pressure air atomization spray, using a paper (or foam) filter as control, exhausting to exhaust fan E3.
- (i) One (1) Final Cleaning operation, cleaning finished recreational vehicles, method of application is hand and aerosol.

- (j) A woodworking shop located in plant 9, using a cyclone and a baghouse for control. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 4650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.

The exhaust fans E1, E2, and E3 at plant 9 are separate and different from ventilation fans E1, E2, and E3 at plants 1, 2, and 3.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating 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) Space heaters, process heaters, or boilers using the following fuels:
- Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.
- The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.

- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.
- (l) Paved and unpaved roads and parking lots with public access
- (m) **Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.**
- (n) **Cutting equipment for cutting composite counter tops (12' x 3') located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) belt sanders, and using two (2) portable dust collectors for control.**

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2, the woodworking and cutting operations in Plant 14, are not subject as their potential emissions are less than five hundred fifty-one thousandths (0.551) pounds per hour. Therefore, the requirements of 326 IAC 6-3-2 (e) do not apply to the woodworking and cutting operations in Plant 14.

Proposed changes to FESOP 039-17521-00407

1. Title page

The title page has been revised to include the address of the location the new Plant 14. Likewise the header has been revised to include Plant 14 as follows (please see next two pages):



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

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

**Damon Corporation Plants 1, 2, 3, 9, and 14
52570 Paul, 2929 and 2850 Gateway Drive
Elkhart, Indiana 46515**

(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.: F039-17521-00407	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 18, 2003 Expiration Date: December 18, 2008
First Minor Permit Revision 039-19533-00407	Pages affected: 7, 8, 8a, 9 and 50
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

2. Section A

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 motor home manufacturing operation.

Authorized individual:	President
Source Address:	52570 Paul, 2929 and 2850 Gateway Drive, Elkhart, Indiana 46514
Mailing Address:	P.O. Box 2888, Elkhart, IN 46515-2888
General Source Phone:	(574) -266-0924
SIC Code:	3792
Source Location Status:	Elkhart Attainment for all criteria pollutants Attainment for 1-hour Ozone Basic Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR ; 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 stationary motor home manufacturing operation consists of five (5) plants:

- (a) Plants 1, 2 and 3 are located at 52570 Paul Dr., Elkhart, IN 46514; ~~and~~
- (b) Plant 9 is located at 2929 Gateway Drive, Elkhart, IN 46514; **and**
- (c) **Plant 14 to be located at 2850 Gateway Drive Elkhart, IN 46514.**

The following are reasons why OAQ combined the sources into one:

- (a) OAQ considers Plants 1, 2, and 3 as support facilities for Plant 9. According to the letter submitted by Damon Corporation, dated May 20, 1997, the Plant 1 site prepares motor home chassis for final assembly at Plant 9, which is located within 1 mile. The sidewalls and roofs that are built at Plant 2 and the floors that are manufactured at Plant 3 are also transported to Plant 9 for final assembly.

The new Plant 14 will house some sub-assembly operations consisting of building soft upholstery valences and two miter box power saws that will be moved from Plant 9, counter top build-ups, one (1) table saw, one (1) belt sander and two (2) portable dust collectors. These changes will not increase the potential to emit from the source and will not trigger any additional Federal or State rules that are applicable to the source.

- (b) Plants 1, 2, 3, ~~and~~ 9 **and 14** share the same SIC code, which is 3792.
- (c) Plants 1, 2, 3, ~~and~~ 9 **and 14** are all owned by the same company.

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) Space heaters, process heaters, or boilers using the following fuels:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

The tank has a shell length of 144 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 81 gallons per day.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day.

The tank has a shell length of 72 inches, a shell diameter of 46 inches (45 inches at the waist), and a maximum throughput of 417 gallons per day.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (f) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (g) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (h) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (i) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (j) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (k) Touch up and repair operations located at plant 9. The potential emissions are less than five (5) tons per year of VOC, one (1) ton per year of any HAP, and two and a half tons per year of the combination of all HAPs.
- (l) Paved and unpaved roads and parking lots with public access

- (m) **Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.**
- (n) **Cutting equipment for cutting composite counter tops (12' x 3') located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) belt sanders, and using two (2) portable dust collectors for control.**

3. Section D.12

SECTION D.12 FACILITY OPERATION CONDITIONS

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

- (a) A woodworking shop located in plant 1, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking shop consists of handheld equipment and various mounted saws.
- (b) Woodworking equipment located in plant 2, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (c) Woodworking equipment located in plant 3, using a portable dust collector for control, exhausting internally. The maximum designed outlet grain loading is 0.02 gr/scf and the maximum airflow is 650 acfm. The woodworking equipment consists of handheld equipment and various mounted saws.
- (d) The window routers which route openings in sidewalls and roofs. The routers are handheld units.
- (e) Twelve (12) metal inert gas welders at Plant 1 and two (2) metal inert gas welder at Plant 3, type of wire used E70S-3, maximum total hourly consumption of wire is 12.0 pounds and one (1) plasma cutter, maximum metal thickness cut is 3/8 inches and maximum metal cutting rate is 12 inches/minute.
- (f) Four (4) metal inert gas welders at Plant 1, type of wire used ER5356, maximum hourly consumption of wire per station is 0.6675 pounds and one (1) plasma cutter, maximum metal thickness cut is 1/4 inches and maximum metal cutting rate is 6 inches/minute.
- (g) **Sub-assembly operations located at Plant 14, consisting of building soft upholstery valences and some woodworking activities with particulate emissions less than 5 pounds per hour or less than 25 pounds per day. The woodworking equipment consists of handheld units.**
- (n) **Cutting equipment for cutting composite counter tops (12' x 3') located at Plant 14, with particulate emissions less than 5 pounds per hour or less than 25 pounds per day, consisting of two (2) miter box power saws, one (1) Table Saw, one (1) belt sanders, and using two (2) portable dust collectors for control.**

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

Pursuant to T039-6434-00407, issued on December 22, 1998 and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the woodworking shop at Plant 1, the woodworking equipment at Plant 2, the woodworking equipment at Plant 3, **the woodworking activities and cutting equipment in Plant 14**, the window routers, and the metal inert gas welders shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Conclusion

The permit revision shall be subject to the conditions of the attached proposed **Minor Permit Revision No. 039-19533-00407**.