



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: October 20, 2005
RE: Dutchmen Manufacturing / 039-19844-00376
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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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Dutchmen Manufacturing, Inc.
2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd.
Goshen, Indiana 46526**

(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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

| | |
|---|--|
| Operation Permit No.: F 039-19844-00376 | |
| Issued by: Original Signed By: Paul Dubenetzky, Chief Permits Branch Office of Air Quality | Issuance Date: October 20, 2005 Expiration Date: October 20, 2010 |

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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 travel trailer manufacturing source.

| | |
|-------------------------|---|
| Authorized individual: | President |
| Source Address: | 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana 46526 |
| Mailing Address: | 2164 Caragana Ct., Goshen, Indiana 46526 |
| General Source Phone: | (574) 534-1224 |
| SIC Code: | 3792 |
| Source Location Status: | Elkhart County Nonattainment for ozone based on the 8-hour 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 travel trailer manufacturing source consists of three buildings:

- (a) The Classic travel trailer production line is located at 2021 Kercher Road, Goshen, Indiana 46526;
- (b) The Colorado travel trailer production line is located at 2142 Caragana Ct., Goshen, Indiana 46526; and
- (c) The wall lamination and wood waste grinding is located at 2410 Dierdorff Rd., Goshen, Indiana 46526.

Since the three (3) buildings are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

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:

Dutchmen Manufacturing, Inc. - 2021 Kercher Road, Goshen, Indiana

- (a) One (1) Classic travel trailer production line, constructed in 1999, with a maximum production capacity of 1.75 trailers per hour and a maximum throughput of 4,352.25 pounds of wood per hour, including the following operations:
 - (1) One (1) cabinet and milling area, equipped with two (2) table saws, one (1) radial arm saw, one (1) vertical panel saw, one (1) vertical band saw, one (1) belt sander, and one (1) drill press exhausting through one (1) cyclone, identified as P1; three (3) miter saws, exhausting through two (2) portable baghouses,

identified as B1 and B2; and two (2) jet pin routers exhausting through one (1) cyclone, identified as P2; using aerosol cans and non-spray methods to apply materials; capacity: 2.5 travel trailers per hour and 1,186.5 pounds of wood, panelboard and plywood per hour, total.

- (2) One (1) slide-out assembly area, using aerosol cans and non-spray methods to apply materials, capacity: 1.75 travel trailers per hour.
- (3) One (1) assembly and final finish area, equipped with two (2) miter saws for wood trims, exhausting through one (1) baghouse, identified as B3; one (1) table saw for back-up and remedial cutting of precut wood roof panels, exhausting to one (1) baghouse, identified as B4; and metal working equipment including two (2) miter saws for metal and PVC tubes, one (1) band saw, three (3) miter saws, one (1) router, one (1) radial arm saw, two (2) chop saws, and two (2) metal grinders; using one (1) caulk gun, aerosol cans and non-spray methods to apply materials; capacity: 1.75 travel trailers per hour, 0.798 pounds of wood through the woodworking process per hour, 10.3 pounds of metal through the metal working process per hour, and 5.7 pounds of PVC through the metal working process per hour, total.
- (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.52 units per hour.

Dutchmen Manufacturing, Inc. - 2142 Caragana Court, Goshen, Indiana

- (b) One (1) Colorado travel trailer production line, constructed in the present location in 2003, with a maximum production capacity of 1.25 travel trailers per hour and a maximum throughput of 2,767.5 pounds of wood per hour, including the following operations:
 - (1) One (1) cabinet and milling area, equipped with eight (8) miter saws, one (1) table saw, two (2) radial arm saws, one (1) horizontal band saw, one (1) belt sander, five (5) fix routers, and one (1) pin router, all exhausting through one (1) baghouse, identified as P3; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 903.125 pounds of wood, luan, panelboard and plywood per hour.
 - (2) One (1) slide-out assembly area, equipped with one (1) miter saw, exhausting through one (1) portable baghouse, identified as B5; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 18.4 pounds of wood through the sawing operation per hour.
 - (3) One (1) assembly and final finish area, equipped with two (2) miter saws for cutting wood trims exhausting through one (1) portable baghouse, identified as B6; two (2) miter saws for cutting aluminum tubes and pipes each exhausting through one (1) of two (2) portable baghouses, identified as B7 and B8; one (1) miter saw for cutting ABS/PVC pipes, exhausting through one (1) portable baghouse, identified as B8; one (1) chop saw for cutting metal rods, exhausting through one (1) portable baghouse, identified as B9; one (1) band saw for cutting aluminum extrusions, exhausting through a portable baghouse, identified as B10; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour, 9.06 pounds of wood through the woodworking process per hour, 21.6 pounds of metal through the metal working process per hour, and 16.0 pounds of PVC through the metal working process per hour, total.
 - (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.38 units per hour.

Dutchmen Manufacturing, Inc. - 2410 Dierdorff Rd., Goshen, Indiana

- (c) One (1) wall lamination area, installed in 2005, equipped with three (3) miter saws, one (1) table saw, one (1) radial arm saw, one (1) upright panel saw, one (1) vertical band saw, one (1) horizontal band saw, one (1) belt sander, one (1) jet pin router, one (1) hot melt laminating machine, and one (1) cold adhesive laminating machine, using aerosol cans and non-spray methods to apply materials, with all saws exhausting through one (1) baghouse, identified as B11, capacity: 1.75 Classic Line units per hour, 1.25 Colorado Line units per hour, and 109 pounds of wood through the woodworking process per hour.
- (d) One (1) waste minimization, wood waste grinding system, constructed in 2005, equipped with a baghouse, identified as P4, with a return air duct exhausting inside or to the atmosphere, capacity: 36 tons of wood per week.

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

- (a) The following welding and cutting operations:
 - (1) Two (2) metal inert gas welding stations using steel wire, with a capacity of 0.354 pound per hour wire, each.
 - (2) Two (2) metal inert gas welding stations using aluminum wire, with a capacity of 0.1 pound per hour wire, each.
 - (3) Two (2) metal inert gas welding stations using silicone carbide wire, with a capacity of 0.02 pound per hour wire, each.
 - (4) Two (2) stick welding stations with a capacity of 0.12 pound per hour electrode.
 - (5) One (1) oxyacetylene cutting station, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) natural gas-fired radiant heater, identified as HW1, capacity: 0.150 million British thermal units per hour (mmBtu/hr).
 - (2) Two (2) natural gas-fired space heaters, identified as H6 and H7, capacity: 0.250 mmBtu/hr, each.
 - (3) One (1) natural gas-fired air circulator, identified as L1, in the lamination area, capacity: 0.400 mmBtu/hr.
 - (4) Two (2) natural gas-fired air circulators, identified as L2 and L3, in the lamination area, capacity: 0.580 mmBtu/hr, each.
 - (5) Two (2) natural gas-fired radiant heaters, identified as L4 and L5, in the lamination area, capacity: 0.100 mmBtu/hr, each.
- (c) One (1) hot-melt gluing operation, which includes a heating device, application device and an atmospheric humidifying system emitting only water vapor. Cleanup operation is accomplished by using absorbent and no solvents.
- (d) Diesel fuel above ground storage tank, with a capacity of 250 gallons and dispersing less than 1,000 gallons per month.

- (e) Hydraulic oil storage tank, with a capacity of 250 gallons located inside the building.
- (f) 55-gallon containers of roof glue.
- (g) Paved and unpaved roads used for storing chassis frame and units.

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
 - (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Northern Regional Office: 574-245-4870, Facsimile Number: 574-245-4877

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

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

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

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

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

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

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

investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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

- (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

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

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

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

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

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

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (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

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

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

C.14 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.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 IAC2-1.1-1(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
- (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)]:

Dutchmen Manufacturing, Inc. - 2021 Kercher Road, Goshen, Indiana

- (a) One (1) Classic travel trailer production line, constructed in 1999, with a maximum production capacity of 1.75 trailers per hour and a maximum throughput of 4,352.25 pounds of wood per hour, including the following operations:
- (1) One (1) cabinet and milling area, equipped with two (2) table saws, one (1) radial arm saw, one (1) vertical panel saw, one (1) vertical band saw, one (1) belt sander, and one (1) drill press exhausting through one (1) cyclone, identified as P1; three (3) miter saws, exhausting through two (2) portable baghouses, identified as B1 and B2; and two (2) jet pin routers exhausting through one (1) cyclone, identified as P2; using aerosol cans and non-spray methods to apply materials; capacity: 2.5 travel trailers per hour and 1,186.5 pounds of wood, panelboard and plywood per hour, total.
 - (2) One (1) slide-out assembly area, using aerosol cans and non-spray methods to apply materials, capacity: 1.75 travel trailers per hour.
 - (3) One (1) assembly and final finish area, equipped with two (2) miter saws for wood trims, exhausting through one (1) baghouse, identified as B3; one (1) table saw for back-up and remedial cutting of precut wood roof panels, exhausting to one (1) baghouse, identified as B4; and metal working equipment including two (2) miter saws for metal and PVC tubes, one (1) band saw, three (3) miter saws, one (1) router, one (1) radial arm saw, two (2) chop saws, and two (2) metal grinders; using one (1) caulk gun, aerosol cans and non-spray methods to apply materials; capacity: 1.75 travel trailers per hour, 0.798 pounds of wood through the woodworking process per hour, 10.3 pounds of metal through the metal working process per hour, and 5.7 pounds of PVC through the metal working process per hour, total.
 - (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.52 units per hour.

Dutchmen Manufacturing, Inc. - 2142 Caragana Court, Goshen, Indiana

- (b) One (1) Colorado travel trailer production line, constructed in the present location in 2003, with a maximum production capacity of 1.25 travel trailers per hour and a maximum throughput of 2,767.5 pounds of wood per hour, including the following operations:
- (1) One (1) cabinet and milling area, equipped with eight (8) miter saws, one (1) table saw, two (2) radial arm saws, one (1) horizontal band saw, one (1) belt sander, five (5) fix routers, and one (1) pin router, all exhausting through one (1) baghouse, identified as P3; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 903.125 pounds of wood, luan, panelboard and plywood per hour.
 - (2) One (1) slide-out assembly area, equipped with one (1) miter saw, exhausting through one (1) portable baghouse, identified as B5; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 18.4 pounds of wood through the sawing operation per hour.

- (3) One (1) assembly and final finish area, equipped with two (2) miter saws for cutting wood trims exhausting through one (1) portable baghouse, identified as B6; two (2) miter saws for cutting aluminum tubes and pipes each exhausting through one (1) of two (2) portable baghouses, identified as B7 and B8; one (1) miter saw for cutting ABS/PVC pipes, exhausting through one (1) portable baghouse, identified as B8; one (1) chop saw for cutting metal rods, exhausting through one (1) portable baghouse, identified as B9; one (1) band saw for cutting aluminum extrusions, exhausting through a portable baghouse, identified as B10; using aerosol cans and non-spray methods to apply materials; capacity; 1.25 travel trailers per hour, 9.06 pounds of wood through the woodworking process per hour, 21.6 pounds of metal through the metal working process per hour, and 16.0 pounds of PVC through the metal working process per hour, total.
- (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.38 units per hour.

Dutchmen Manufacturing, Inc. - 2410 Dierdorff Rd., Goshen, Indiana

- (c) One (1) wall lamination area, installed in 2005, equipped with three (3) miter saws, one (1) table saw, one (1) radial arm saw, one (1) upright panel saw, one (1) vertical band saw, one (1) horizontal band saw, one (1) belt sander, one (1) jet pin router, one (1) hot melt laminating machine, and one (1) cold adhesive laminating machine, using aerosol cans and non-spray methods to apply materials, with all saws exhausting through one (1) baghouse, identified as B11, capacity: 1.75 Classic Line units per hour, 1.25 Colorado Line units per hour, and 109 pounds of wood through the woodworking process per hour.
- (d) One (1) waste minimization, wood waste grinding system, constructed in 2005, equipped with a baghouse, identified as P4, with a return air duct exhausting inside or to the atmosphere, capacity: 36 tons of wood per week.

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 2-3] [326 IAC 8-1-6]

- (a) The use of VOC, including coatings, adhesives, sealants, dilution solvents, and cleaning solvents at the Classic travel trailer production line, Colorado travel trailer production line, and wall lamination area, combined, shall be limited to 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per year from the entire source. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70) not applicable.
- (b) The use of VOC when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, rubber, and wood parts, other than wood furniture and cabinets, at the Classic travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC from the Classic travel trailer production process, other than metal coating and wood furniture and cabinet coating, to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (c) The use of VOC when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, vinyl, rubber, and wood parts, other than wood furniture and cabinets, at the Colorado travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC from the Colorado travel trailer production process, other than metal coating and wood furniture and cabinet coating, to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

D.1.3 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations at the cabinet and milling area for the Classic travel trailer production line, located at 2021 Kercher Road, shall not exceed 2.89 pounds per hour, when operating at a process weight rate of 1,186.5 pounds of wood per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking and metalworking (including PVC cutting) operations at the assembly and final finish area for the Classic travel trailer production line, located at 2021 Kercher Road, shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations at the cabinet and milling area for the Colorado travel trailer production line, located at 2142 Caragana Court, shall not exceed 2.41 pounds per hour, when operating at a process weight rate of 903.125 pounds of wood per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations at the assembly and final finish area for the Colorado travel trailer production line, located at 2142 Caragana Court, shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 pounds per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations at the wall lamination area, located at 2410 Dierdorff Road, shall not exceed 0.584 pounds per hour, when operating at a process weight rate of 109 pounds of wood per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the wood waste grinding operation, located at 2410 Dierdorff Road, shall not exceed 3.82 pounds per hour, when operating at a process weight rate of 1,800 pounds of wood per hour.

These limitations are based upon the following:

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

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

These limitations shall also limit the potential to emit PM from the entire source to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

D.1.4 Particulate (PM₁₀) [326 IAC 2-2] [326 IAC 2-8]

Pursuant to 326 IAC 2-8, FESOP, the PM₁₀ emissions shall be limited as shown in the following table. As a result of these limitations, the potential to emit PM₁₀ is limited to less than 100 tons per year from the entire source. Therefore, compliance with these limits makes 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

| Process | Hourly PM ₁₀ Emission Limitation (lbs/hr) |
|---|--|
| Cabinet and milling area woodworking | 2.89 |
| Assembly and final finish area woodworking and metalworking (including PVC cutting) | 0.551 |
| Cabinet and milling area woodworking | 2.41 |
| Assembly and final finish area woodworking and metalworking (including PVC cutting) | 0.551 |
| Wall lamination area woodworking | 0.584 |
| Wood waste grinding | 3.82 |

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for all of these facilities and the control devices identified as P1, P2, P3, P4, B3, B4, B6, B7, B8, B9 and B10.

Compliance Determination Requirements

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

Compliance with the VOC usage limitations contained in Condition D.1.2 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.

D.1.7 Particulate Control

- (a) In order to comply with Conditions D.1.3 and D.1.4, the cyclone identified as P1, for particulate control, shall be in operation and control emissions from the cabinet and milling area woodworking processes at the Classic travel trailer production line at all times that the cabinet and milling area woodworking processes at the Classic travel trailer production line are in operation.
- (b) In order to comply with Conditions D.1.3 and D.1.4, the cyclone identified as P2, for particulate control, shall be in operation and control emissions from the two (2) jet pin routers at the cabinet and milling area of the Classic travel trailer production line at all times that the two (2) jet pin routers are in operation.
- (c) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B3, for particulate control, shall be in operation and control emissions from the two (2) miter saws for wood trims in the assembly and final finish area of the Classic travel trailer production line at all times that the two (2) miter saws are in operation.
- (d) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B4, for particulate control, shall be in operation and control emissions from the one (1) table saw in the assembly and final finish area of the Classic travel trailer production line at all times that the one (1) table saw is in operation.
- (e) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as P3, for particulate control, shall be in operation and control emissions from the cabinet and milling area at the Colorado travel trailer production line at all times that the cabinet and milling area woodworking processes at the Colorado travel trailer production line are in operation.
- (f) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B6, for particulate control shall be in operation and control emissions from the two (2) miter saws for cutting wood trims at the assembly and final finish area of the Colorado travel trailer production line at all times that the two (2) miter saws are in operation.
- (g) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B7, for particulate control shall be in operation and control emissions from the two (2) miter saws for cutting aluminum tubes and pipes at the assembly and final finish area of the Colorado travel trailer production line at all times that the two (2) miter saws are in operation.
- (h) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B8, for particulate control shall be in operation and control emissions from the one (1) miter saw for cutting ABS/PVC pipes at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) miter saw is in operation.
- (i) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B9, for particulate control shall be in operation and control emissions from the one (1) chop saw for cutting metal rods at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) chop saw is in operation.
- (j) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as B10, for particulate control shall be in operation and control emissions from the one (1) band saw

for cutting aluminum extrusions at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) band saw is in operation.

- (k) In order to comply with Conditions D.1.3 and D.1.4, the baghouse identified as P4, for particulate control shall be in operation and control emissions from the wood waste minimization grinder at all times that the wood waste minimization grinder is in operation.

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

D.1.8 Visible Emissions Notations

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

D.1.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Classic travel trailer production line assembly and final finish woodworking (B3 and B4), Colorado travel trailer production line cabinet and milling area (P3), Colorado travel trailer production line assembly and final finish area (B6 through B10), and the wood waste grinding (P4) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.11 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones (P1 and P2) controlling the Classic travel trailer production line cabinet and milling area woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.12 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2(a), (b) and (c), 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 usage limits and the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month for each production line and total; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the cyclone stack exhausts (P1 and P2) and baghouse stack exhausts (B3, B4, B6, B7, B8, B9, B10, P3 and P4).
- (c) To document compliance with Conditions D.1.9 and D.1.11, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.9 and D.1.11 and the dates the vents are redirected.
- (d) To document compliance with Condition D.1.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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).

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

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

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana
46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376

**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
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana
46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376

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

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| |
|---|
| 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: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana 46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376
Facilities: Classic travel trailer production line, Colorado travel trailer production line, and wall lamination
Parameter: VOC usage, including coatings, sealants, adhesives, dilution solvents, and cleaning solvents
Limit: 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (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: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana 46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376
Facility: Classic travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas
Parameter: VOC usage when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, rubber, and wood parts, other than wood furniture and cabinets
Limit: Less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (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: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana 46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376
Facility: Colorado travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas
Parameter: VOC usage when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, rubber, and wood parts, other than wood furniture and cabinets
Limit: Less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (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: Dutchmen Manufacturing, Inc.
Source Address: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana
46526
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: F 039-19844-00376

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|--|-------------------------------|
| 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". | |
| <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: | Dutchmen Manufacturing, Inc. |
| Source Location: | 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd., Goshen, Indiana 46526 |
| County: | Elkhart |
| SIC Code: | 3792 |
| Operation Permit No.: | F 039-11273-00376 |
| Operation Permit Issuance Date: | December 6, 1999 |
| Permit Renewal No.: | F 039-19844-00376 |
| Permit Reviewer: | CarrieAnn Paukowits |

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Dutchmen Manufacturing, Inc. relating to the operation of a travel trailer manufacturing source.

Source Definition

- (a) This Source Definition from Significant Permit Revision 039-18355-00376, issued on March 8, 2004, has been incorporated into this permit as follows:

This travel trailer manufacturing source consists of two (2) buildings, located at 2021 Kercher Road (previously 17705 County Road 38) and 2142 Caragana Ct., Goshen, Indiana 46526. Since the two (2) buildings are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they are considered one (1) source.

- (b) The building located at 2410 Dierdorff Rd., Goshen, Indiana 46526, was constructed after the Significant Permit Revision (039-18355-00376, issued on March 8, 2004) was issued. Therefore, it was not part of the previous source definition. However, it is also located on contiguous properties with the other two (2) buildings, has the same SIC Code and is owned by the same company. Therefore, it is also considered part of the same source.

Permitted Emission Units and Pollution Control Equipment

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

Dutchmen Manufacturing, Inc. - 2021 Kercher Road, Goshen, Indiana

- (a) One (1) Classic travel trailer production line, constructed in 1999, with a maximum production capacity of 1.75 trailers per hour and a maximum throughput of 4,352.25 pounds of wood per hour, including the following operations:
- (1) One (1) cabinet and milling area, equipped with two (2) table saws, one (1) radial arm saw, one (1) vertical panel saw, one (1) vertical band saw, one (1) belt sander, and one (1) drill press exhausting through one (1) cyclone, identified as P1; three (3) miter saws, exhausting through two (2) portable baghouses, identified as B1 and B2; and two (2) jet pin routers exhausting through one (1) cyclone, identified as P2; using aerosol cans and non-spray methods to apply materials; capacity: 2.5 travel trailers per hour and 1,186.5 pounds of wood, panelboard and plywood per hour, total.

- (2) One (1) slide-out assembly area, using aerosol cans and non-spray methods to apply materials, capacity: 1.75 travel trailers per hour.
- (3) One (1) assembly and final finish area, equipped with two (2) miter saws for wood trims, exhausting through one (1) baghouse, identified as B3; one (1) table saw for back-up and remedial cutting of precut wood roof panels, exhausting to one (1) baghouse, identified as B4; and metal working equipment including two (2) miter saws for metal and PVC tubes, one (1) band saw, three (3) miter saws, one (1) router, one (1) radial arm saw, two (2) chop saws, and two (2) metal grinders; using one (1) caulk gun, aerosol cans and non-spray methods to apply materials; capacity: 1.75 travel trailers per hour, 0.798 pounds of wood through the woodworking process per hour, 10.3 pounds of metal through the metal working process per hour, and 5.7 pounds of PVC through the metal working process per hour, total.
- (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.52 units per hour.

Dutchmen Manufacturing, Inc. - 2142 Caragana Court, Goshen, Indiana

- (b) One (1) Colorado travel trailer production line, constructed in the present location in 2003, with a maximum production capacity of 1.25 travel trailers per hour and a maximum throughput of 2,767.5 pounds of wood per hour, including the following operations:
 - (1) One (1) cabinet and milling area, equipped with eight (8) miter saws, one (1) table saw, two (2) radial arm saws, one (1) horizontal band saw, one (1) belt sander, five (5) fix routers, and one (1) pin router, all exhausting through one (1) baghouse, identified as P3; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 903.125 pounds of wood, luan, panelboard and plywood per hour.
 - (2) One (1) slide-out assembly area, equipped with one (1) miter saw, exhausting through one (1) portable baghouse, identified as B5; using aerosol cans and non-spray methods to apply materials; capacity: 1.25 travel trailers per hour and 18.4 pounds of wood through the sawing operation per hour.
 - (3) One (1) assembly and final finish area, equipped with two (2) miter saws for cutting wood trims exhausting through one (1) portable baghouse, identified as B6; two (2) miter saws for cutting aluminum tubes and pipes each exhausting through one (1) of two (2) portable baghouses, identified as B7 and B8; one (1) miter saw for cutting ABS/PVC pipes, exhausting through one (1) portable baghouse, identified as B8; one (1) chop saw for cutting metal rods, exhausting through one (1) portable baghouse, identified as B9; one (1) band saw for cutting aluminum extrusions, exhausting through a portable baghouse, identified as B10; using aerosol cans and non-spray methods to apply materials; capacity; 1.25 travel trailers per hour, 9.06 pounds of wood through the woodworking process per hour, 21.6 pounds of metal through the metal working process per hour, and 16.0 pounds of PVC through the metal working process per hour, total.
 - (4) One (1) touchup and repair area, using one (1) HVLP spray gun, aerosol cans and non-spray methods to apply materials, maximum capacity: 0.38 units per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

Dutchmen Manufacturing, Inc. - 2410 Dierdorff Rd., Goshen, Indiana

- (c) One (1) wall lamination area, installed in 2005, equipped with three (3) miter saws, one (1) table saw, one (1) radial arm saw, one (1) upright panel saw, one (1) vertical band saw, one (1) horizontal band saw, one (1) belt sander, one (1) jet pin router, one (1) hot melt laminating machine, and one (1) cold adhesive laminating machine, using aerosol cans and non-spray methods to apply materials, with all saws exhausting through one (1) baghouse, identified as B11, capacity: 1.75 Classic Line units per hour, 1.25 Colorado Line units per hour, and 109 pounds of wood through the woodworking process per hour.
- (d) One (1) waste minimization, wood waste grinding system, constructed in 2005, equipped with a baghouse, identified as P4, with a return air duct exhausting inside or to the atmosphere, capacity: 36 tons of wood per week.

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

There are no proposed emission units during this review process.

Emission Units and Pollution Control Equipment Removed

The wall lamination area for each production line has been moved from 2021 Kercher Road (previously 17705 County Road 38) and 2142 Caragana Court to 2410 Dierdorff Rd. That single wall lamination area serves both lines. Since this building is part of the same source, there is no construction approval required for the relocation.

Insignificant Activities

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

- (a) The following welding and cutting operations: [40 CFR 52, Subpart P]
 - (1) Two (2) metal inert gas welding stations using steel wire, with a capacity of 0.354 pound per hour wire, each.
 - (2) Two (2) metal inert gas welding stations using aluminum wire, with a capacity of 0.1 pound per hour wire, each.
 - (3) Two (2) metal inert gas welding stations using silicone carbide wire, with a capacity of 0.02 pound per hour wire, each.
 - (4) Two (2) stick welding stations with a capacity of 0.12 pound per hour electrode.
 - (5) One (1) oxyacetylene cutting station, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (1) One (1) natural gas-fired radiant heater, identified as HW1, capacity: 0.150 million British thermal units per hour (mmBtu/hr).
 - (2) Two (2) natural gas-fired space heaters, identified as H6 and H7, capacity: 0.250 mmBtu/hr, each.
 - (3) One (1) natural gas-fired air circulator, identified as L1, in the lamination area, capacity: 0.400 mmBtu/hr.
 - (4) Two (2) natural gas-fired air circulators, identified as L2 and L3, in the lamination area, capacity: 0.580 mmBtu/hr, each.
 - (5) Two (2) natural gas-fired radiant heaters, identified as L4 and L5, in the lamination area, capacity: 0.100 mmBtu/hr, each.
- (c) One (1) hot-melt gluing operation, which includes a heating device, application device and an atmospheric humidifying system emitting only water vapor. Cleanup operation is accomplished by using absorbent and no solvents.
 - (d) Diesel fuel above ground storage tank, with a capacity of 250 gallons and dispersing less than 1,000 gallons per month.
 - (e) Hydraulic oil storage tank, with a capacity of 250 gallons located inside the building.
 - (f) 55-gallon containers of roof glue.
 - (g) Paved and unpaved roads used for storing chassis frame and units.

Existing Approvals

The source has been operating under the previous FESOP 039-11273-00376 issued on December 6, 1999, with an expiration date of December 6, 2004, and the following amendments and revisions:

- (a) Minor Permit Revision 039-11751-00376, issued on January 31, 2000;
- (b) Reopening 039-13028-00376, issued on September 25, 2001; and
- (c) Significant Permit Revision 039-18355-00376, issued on March 8, 2004.

All conditions from previous approvals, that have not been previously removed, were incorporated into this FESOP except the following:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) Condition D.1.5(a): The volatile organic input usage in the Classic travel trailer production line when coating metal part of the trailer shall be limited to less than 15 pounds per

day. Compliance with this condition will make 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

Reason not incorporated: The unrestricted potential VOC emissions from the Classic travel trailer production line are less than 15 pounds per day when coating metal parts. Thus, the requirements of 326 IAC 8-2-9 are not applicable. The source will not be required to submit reports of the daily emissions since the emissions cannot be more than 15 pounds per day based upon current worst-case coatings and maximum production levels.

- (c) Condition D.1.7: (a) The single HAP input usage from the entire source shall be limited to less than ten (10) tons per twelve-month period, rolled on a monthly basis. During the first twelve (12) months of operation, single HAP input usage divided by accumulated months of operation shall be less than single HAP emissions of 0.83 tons per month. (b) The combined HAPs input usage from the entire source shall be limited to less than twenty-five (25) tons per twelve-month period, rolled on a monthly basis. During the first twelve (12) months of operation, combined HAPs input usage divided by accumulated months of operation shall be less than combined HAP emissions of 2.08 tons per month. Compliance with (a) and (b) of this condition will make 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Reason not incorporated: HAP emission limitations were required in the initial FESOP because of the toluene emissions from one of the coatings. That coating is no longer used by this source. As a result, the unrestricted potential individual HAP emissions are less than 10 tons per year and the unrestricted emissions of any combination of HAPs are less than 25 tons per year. Therefore, the HAP limit is not required.

- (d) Condition D.1.8 (b) through (d): (b) The PM emissions from the Classic Line woodworking operation shall not exceed 7.99 pounds per hour. (c) The PM emissions from the Colorado Line woodworking operation shall not exceed 5.10 pounds per hour. (d) The PM emissions from the County Road 38 plant existing woodworking operation shall not exceed 3.3 pounds per hour.

Reason not incorporated: The woodworking operations are still subject to the requirements of 326 IAC 6-3-2. However the limitations have been segregated based on the individual processes at each production line. See "326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)" under the *State Rule Applicability - Individual Facilities* section of this document.

Enforcement Issue

- (a) IDEM is aware that the one (1) waste minimization, wood waste grinding system has been constructed and operated prior to receipt of the proper permit. The subject equipment is the wood waste grinding system listed in this Technical Support Document under the heading *Unpermitted Emission Units and Pollution Control Equipment*. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (b) IDEM is aware that the Permittee did not apply for a renewal in a timely manner. IDEM is reviewing this matter and has taken appropriate action.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on August 16, 2004. Additional information was received on June 8 and 12, and August 15, 16, 17, 23 and 24, 2005.

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

Emission Calculations

See pages 1 through 10 of Appendix A of this document for detailed emission calculations.

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 | 2,894 |
| PM ₁₀ | 2,894 |
| SO ₂ | 0.006 |
| VOC | 148 |
| CO | 0.887 |
| NO _x | 1.06 |

| HAPs | Unrestricted Potential Emissions (tons/yr) |
|---------------|---|
| Toluene | 1.49 |
| Hexane | 0.817 |
| MEK | 7.22 |
| Vinyl acetate | 0.151 |
| Xylene | 2.85 |
| Ethyl benzene | 0.849 |
| Cumene | 0.026 |
| Methanol | 0.395 |
| Glycol Ethers | 0.023 |

| HAPs | Unrestricted Potential Emissions (tons/yr) |
|-----------------|--|
| Naphthalene | 0.005 |
| MDI | 0.018 |
| Manganese | 0.005 |
| Benzene | Negligible |
| Dichlorobenzene | Negligible |
| Formaldehyde | Negligible |
| Lead | Negligible |
| Cadmium | Negligible |
| Chromium | Negligible |
| Nickel | Negligible |
| Total | 13.9 |

- (a) The unrestricted potential emissions 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 applicant has elected to remain a FESOP source by continuing to limit its emissions below the Title V levels. Therefore, a FESOP Renewal will be issued.
- (b) **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.

| Process/emission unit | Potential To Emit (tons/year) | | | | | | |
|---|-------------------------------|------------------|-----------------|------|----|-----------------|---------------------------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Classic travel trailer production line coating processes | 0.184 | 0.184 | - | 99.0 | - | - | 4.21 (MEK); 7.85 total |
| Colorado travel trailer production line coating processes | 0.161 | 0.161 | - | | - | - | 3.01 (MEK); 5.84 total |
| Wall lamination coating processes | 0.256 | 0.256 | - | | - | - | 0.112 (Toluene); 0.131 total |

| Process/emission unit | Potential To Emit (tons/year) | | | | | | |
|--|-------------------------------|------------------|-----------------|-------|-------|-----------------|---------------------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Classic travel trailer production line cabinet and milling area woodworking | 12.7 | 12.7 | - | - | - | - | - |
| Classic travel trailer production line assembly and final finish area woodworking | 2.41 | 2.41 | - | - | - | - | - |
| Colorado travel trailer production line cabinet and milling area | 10.6 | 10.6 | - | - | - | - | - |
| Colorado travel trailer production line slide-out assembly area | 1.17 | 1.17 | - | - | - | - | - |
| Colorado travel trailer production line assembly and final finish area woodworking | 2.41 | 2.41 | - | - | - | - | - |
| Wall lamination area woodworking | 2.56 | 2.56 | - | - | - | - | - |
| Wood waste minimization | 16.7 | 16.7 | - | - | - | - | - |
| Insignificant Activities | 0.085 | 0.145 | 0.006 | 0.058 | 0.887 | 1.06 | 0.024 |
| Total Emissions | 49.2 | 49.3 | 0.006 | < 100 | 0.887 | 1.06 | 7.22 (MEK); 13.9 total |

The values in this table represent the unrestricted potential emissions except for the following:

- (a) The potential to emit VOC from the coating operations are limited to 99.0 tons per year as indicated under "326 IAC 2-8 (FESOP)" in the *State Rule Applicability - Entire Source* section of this document.
- (b) The potential to emit PM from the woodworking operations are limited as shown in this table and described under "326 IAC 2-2 (Prevention of Significant Deterioration (PSD))" in the *State Rule Applicability - Entire Source* section of this document.
- (c) The potential to emit PM₁₀ from the woodworking operations are limited as shown in this table and described under "326 IAC 2-8 (FESOP)" in the *State Rule Applicability - Entire Source* section of this document.

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 of 326 IAC 2-3, Emission Offset.
- (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 surrogate for PM_{2.5} emissions.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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 | 71.8 |
| PM ₁₀ | 71.8 |
| SO ₂ | 0.006 |
| VOC | 55.5 |
| CO | 0.887 |

| | |
|------------------|------|
| NO _x | 1.06 |
| Single HAP | < 10 |
| Combination HAPs | < 25 |

- (a) 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.
- (b) The potential to emit PM, PM₁₀, VOC, single HAP and combination HAPs in this table is based upon the limited potential to emit in the initial FESOP (F 039-11273-00376) issued on December 6, 1999, and Significant Permit Revision 039-18355-00376, issued on March 8, 2004. The potential to emit SO₂, CO and NO_x are equivalent to the potential emissions calculated for this renewal, since those emissions are not limited.

Federal Rule Applicability

- (a) The diesel storage tank has a capacity less than 75 cubic meters. Therefore, the requirements of 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit for this source.
- (b) This source does not coat metal furniture. Therefore, the requirements of 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture, and 40 CFR 63, Subpart RRRR, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture, are not included in the permit for this source.
- (c) The travel trailers assembled at this source are not automobiles or light duty trucks. Therefore, the requirements of 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, and 40 CFR 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, are not included in the permit for this source.
- (d) This source is not a major source of HAPs. Therefore, requirements of 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, are not included in the permit for this source.
- (e) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit for this source.
- (f) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, are not included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

The unrestricted potential NO_x emissions are less than one hundred (100) tons per year. The potential to emit VOC is limited to less than 100 tons per year in order to comply with 326 IAC 2-8, FESOP. That limit will also ensure that this source remains a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

- (a) The unrestricted potential PM emissions are greater than 250 tons per year from the entire source. The PM emissions are limited pursuant to 326 IAC 6-3-2 (see the *State Rule Applicability - Individual Facilities* section of this document). As a result of those limits, the potential to emit PM is limited to less than 250 tons per year. Compliance with 326 IAC 6-3-2 renders 326 IAC 2-2 not applicable. The limits are as follows:

| Process | 326 IAC 6-3-2 Hourly Emission Limitation (lbs/hr) | Equivalent Annual Emissions (tons/yr) | Control Device Required |
|---|---|---------------------------------------|-------------------------|
| Classic travel trailer production line, located at 2021 Kercher Road | | | |
| Cabinet and milling area woodworking | 2.89 | 12.7 | Cyclones P1 and P2 |
| Assembly and final finish area woodworking and metalworking (including PVC cutting) | 0.551 | 2.41 | Baghouses B3 and B4 |
| Coating | exempt | 0.184 | Not required |
| Colorado travel trailer production line, located at 2142 Caragana Court | | | |
| Cabinet and milling area woodworking | 2.41 | 10.6 | Baghouse P3 |
| Slide-out assembly area woodworking | exempt | 1.17 | None |
| Assembly and final finish area and metalworking (including PVC cutting) | 0.551 | 2.41 | Baghouses B6 - B10 |
| Coating | exempt | 0.161 | Not required |
| 2410 Dierdorff Road | | | |
| Wall lamination area woodworking | 0.584 | 2.56 | Not required |
| Wood waste grinding | 3.82 | 16.7 | P4 |
| Coating | exempt | 0.256 | Not required |
| Entire Source | | | |
| Insignificant Activities | exempt | 0.085 | Not required |
| Total | | 49.2 | |

These limitations were not included in F 039-11273-00376, issued on December 6, 1999. However, the limits pursuant to 326 IAC 6-3-2 in that permit also limited the potential to emit PM to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

- (b) The potential to emit PM₁₀ is limited to less than 100 tons per year in order to comply with 326 IAC 2-8, FESOP. That limit will also ensure that this source remains a minor source of PM₁₀ pursuant to 326 IAC 2-2, PSD.
- (c) The unrestricted potential emissions of each other attainment criteria pollutant are less than two hundred-fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1-1 (New source toxics control)

The operation of this trailer manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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 (FESOP)

- (a) The unrestricted potential VOC emissions are greater than 100 tons per year. Pursuant to 326 IAC 2-8, FESOP, the potential to emit VOC shall be limited to less than 100 tons per year. The use of VOC, including coatings, sealants, adhesives, dilution solvents, and cleaning solvents at the Classic travel trailer production line, Colorado travel trailer production line, and wall lamination area, combined, shall be limited to no more than 99 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than 100 tons per year. Compliance with this limit makes 326 IAC 2-7, Part 70, and 326 IAC 2-3, Emission Offset, not applicable.
- (b) The unrestricted potential PM₁₀ emissions are greater than 100 tons per year. Pursuant to 326 IAC 2-8, FESOP, the potential to emit PM₁₀ shall be limited to less than 100 tons per year. The potential to emit PM₁₀ was not limited by the initial FESOP. However, the particulate emissions were limited by 326 IAC 6-3, which in turn limited PM₁₀ emissions, since PM is equal to PM₁₀ for the processes limited. The PM₁₀ emissions will be specifically limited in this FESOP Renewal. The limitations are equal to the PM limitations listed under 326 IAC 6-3-2 and 326 IAC 2-2, because the PM₁₀ emissions from these facilities are less than or equal to the PM emission. The limitations are as follows:

| Process | Hourly PM ₁₀ Emission Limitation (lbs/hr) | Equivalent Annual PM ₁₀ Emissions (tons/yr) | Control Device Required | Potential Emissions after Required Controls (lbs/hr) |
|---|--|--|-------------------------|--|
| Classic travel trailer production line, located at 2021 Kercher Road | | | | |
| Cabinet and milling area woodworking | 2.89 | 12.7 | Cyclones P1 and P2 | 1.12 |
| Assembly and final finish area woodworking and metalworking (including PVC cutting) | 0.551 | 2.41 | Baghouses 3 and 4 | 0.012 |
| Colorado travel trailer production line, located at 2142 Caragana Court | | | | |
| Cabinet and milling area woodworking | 2.41 | 10.6 | Baghouse P3 | 0.063 |
| Assembly and final finish area woodworking and metalworking (including PVC cutting) | 0.551 | 2.41 | Not required | 0.015 |
| 2410 Dierdorff Road | | | | |
| Wall lamination area woodworking | 0.584 | 2.56 | Not required | 0.267 |
| Wood waste grinding | 3.82 | 16.7 | P4 | 0.037 |
| Total | | 47.4 | | |

The unrestricted potential to emit PM₁₀ from the coating operations is 0.601 tons per year, total, the unrestricted potential to emit PM₁₀ from the slide-out assembly woodworking operations are 1.17 tons per year, and the unrestricted potential to emit PM₁₀ from insignificant activities is 0.145 tons per year. Therefore, these limitations will limit the potential to emit PM₁₀ to less than 100 tons per year from the entire source (47.4 tons/yr from all facilities in the table + 0.601 tons/yr from coating + 0.145 tons/yr from insignificant activities + 1.17 tons/yr from slide-out assembly woodworking = 49.3 tons/yr < 100 tons/yr). As shown in the table, all processes will comply with the emissions limitations. Compliance with these limits makes the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable.

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)

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

- (a) Pursuant to FESOP 039-11273-00376, issued on December 6, 1999, and 40 CFR 52, Subpart P, the particulate matter (PM) from all coating operations shall be limited by the following:

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

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

Under the rule revision, the coating operations are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(14) because the unrestricted PM emissions are less than 0.551 pounds per hour.

- (b) Pursuant to FESOP 039-11273-00376, issued on December 6, 1999, and 40 CFR 52, Subpart P, the particulate matter (PM) from the insignificant welding and flame cutting shall be limited as follows:

| Welding/Electrode Type | No. of Stations | Throughput | PM Emissions Limit (Pounds/hour) |
|------------------------|-----------------|--------------|----------------------------------|
| MIG/Steel | 2 | 0.708 lb/hr | 0.020 |
| MIG/Aluminum | 2 | 0.20 lb/hr | 0.0085 |
| MIG/Silicone Carbide | 2 | 0.020 lb/hr | 0.0018 |
| Stick | 2 | 0.24 lb/hr | 0.0097 |
| Oxyacetylene | 1 | 32.9 K in/yr | 0.07 |

The limitation is based on the following equation:

Interpolation and extrapolation 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:

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

Under the rule revision, the welding is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(9), because less than 625 pounds of wire and rod is consumed per day, and the torch cutting is exempt pursuant to 326 IAC 6-3-1(b)(10) because this source cuts less than 3,400 inches per hour of stock one inch thickness or less.

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

- (a) The particulate from the woodworking operations at the cabinet and milling area for the Classic travel trailer production line, located at 2021 Kercher Road, shall not exceed 2.89 pounds per hour, when operating at a process weight rate of 1,186.5 pounds of wood per hour. The total potential to emit particulate from the woodworking operations at the cabinet and milling area for the Classic travel trailer production line, after control by the cyclones (P1 and P2), but before control by the two (2) baghouses (B1 and B2) is 1.12 pounds per hour (0.147 lbs/hr (after P1) + 0.051 lbs/hr (after P2) + 0.461 lbs/hr (before B1) + 0.461 lbs/hr (before B2) = 1.12 lbs/hr). Therefore, the cabinet and milling area for the Classic travel trailer production line will comply with this rule. The cyclones (P1 and P2) shall be in operation and control emissions from the woodworking at the cabinet and milling operations at the Classic travel trailer production line at all times when the woodworking activities are in operation. Operation of baghouses B1 and B2 are not required in order for this woodworking process to comply with this rule.
- (b) The particulate from the woodworking and metalworking (including PVC cutting) operations at the assembly and final finish area for the Classic travel trailer production line, located at 2021 Kercher Road, shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 pounds per hour. The total potential to emit particulate from the woodworking and metalworking (including PVC cutting) at the assembly and final finish area for the Classic travel trailer production line, after control by the two (2) portable baghouses (B3 and B4) is 0.013 pounds per hour (0.005 lbs/hr (after B3) + 0.005 lbs/hr (after B4) + 0.003 lbs/hr uncontrolled metalworking = 0.013 lbs/hr). Therefore, the assembly and final finish area for the Classic travel trailer production line will comply with this rule.
- (c) The particulate from the woodworking operations at the cabinet and milling area for the Colorado travel trailer production line, located at 2142 Caragana Court, shall not exceed 2.41 pounds per hour, when operating at a process weight rate of 903.125 pounds of wood per hour. The total potential to emit particulate from the woodworking operations at the cabinet and milling area for the Colorado travel trailer production line, after control by the baghouse (P3) is 0.063 pounds per hour. Therefore, the cabinet and milling area for the Colorado travel trailer production line will comply with this rule. The baghouse identified as P3 shall be in operation and control emissions from the woodworking at the cabinet and milling area for the Colorado travel trailer production line at all times when the woodworking activities are in operation.
- (d) The potential to emit particulate is less than 0.551 pound per hour from the slide-out assembly area for the Colorado travel trailer production line, located at 2142 Caragana Court. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the slide-out assembly area is exempt from the requirements of 326 IAC 6-3-2.
- (e) The particulate from the woodworking operations at the assembly and final finish area for the Colorado travel trailer production line, located at 2142 Caragana Court, shall not

exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 pounds per hour. The total potential to emit particulate from the woodworking operations at the assembly and final finish area for the Colorado travel trailer production line, after control by the five (5) baghouses (B6 through B10) is 0.015 pounds per hour (0.003 lbs/hr after each baghouse). Therefore, the assembly and final finish area for the Colorado travel trailer production line will comply with this rule.

- (f) The particulate from the woodworking operations at the wall lamination area, located at 2410 Dierdorff Road, shall not exceed 0.584 pounds per hour, when operating at a process weight rate of 109 pounds of wood per hour. The total potential to emit particulate from the woodworking operations at the wall lamination area, located at 2410 Dierdorff Road, before control by the baghouse (B11) is 0.267 pounds per hour. Therefore, the wall lamination area will comply with this rule.
- (g) The particulate from the wood waste grinding operation, located at 2410 Dierdorff Road, shall not exceed 3.82 pounds per hour, when operating at a process weight rate of 1,800 pounds of wood per hour. The total potential to emit particulate from the wood waste grinding, located at 2410 Dierdorff Road, after control by the baghouse (P4) is 0.037 pounds per hour. Therefore, the wood waste grinding operation will comply with this rule.

These limitations are based upon the following:

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

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

Operation of cyclones P1 and P2 and baghouses P3, P4, B3, B4, B6, B7, B8, B9, and B10 are required in order for the facilities to comply with this rule. Operation of baghouses B1, B2, B5 and B11 are not required.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Most of the materials coated at this source are not regulated by 326 IAC 8-2. Pursuant SPR 039-18355-00376, issued on March 8, 2004, the potential VOC emissions from each facility are limited to less than 25 tons per year. That limit did not include wood coating which was covered by 326 IAC 8-2-12, Wood furniture and Cabinet Coating. However, most of the wood coated at this source is not wood furniture and cabinets, nor is the wood flat wood panels regulated by 326 IAC 8-2-10. Therefore, the wood coating must be included in this limit. Although the wall lamination has been moved to a separate building, it still operates in series with each production line. Therefore, it is part of each facility and the specific processes included in the limits have been identified for clarity. Thus, the requirements of 326 IAC 8-1-6 are not applicable.

- (a) The VOC usage when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, rubber, and wood parts, other than wood furniture and cabinets, at the Classic travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC usage when cleaning or applying coatings, sealants, solvents, or adhesives to plastic, glass, rubber, and wood parts, other than wood furniture and cabinets, at the

Colorado travel trailer production line, including the cabinet and mill, slide-out assembly, assembly and final finish, touchup and repair and wall lamination areas, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The travel trailers assembled at this source are not passenger cars or passenger car derivatives. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

326 IAC 8-2-6 (Metal Furniture Coating Operations)

This source does not coat any metal furniture. Therefore, the requirements of 326 IAC 8-2-6 are not applicable.

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

This source, constructed after July 1, 1990, coats miscellaneous metal products under SIC 37. However, the actual VOC emissions from each production line, when coating metal, are less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-1-2(a)(2) and (4) the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source does not coat any flat wood panels that are considered printed panels, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes. Therefore, the requirements of 326 IAC 8-2-10 are not applicable.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

This source does not perform fabric or vinyl coating. Therefore, the requirements of 326 IAC 8-2-11 are not applicable.

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

The wood furniture and cabinets used in the trailers are pre-coated. However, some sealants and glues are applied to wood furniture and cabinets. Pursuant to FESOP 039-11273-00376, issued on December 6, 1999, the surface coating applied to wood furniture and cabinets at the Classic Travel Trailer Production Line or the Colorado Travel Trailer Production Line shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-

tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-6 (8), "Gasoline dispensing facility" means any facility where gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tank with a capacity of two thousand one hundred seventy-six (2,176) liters (five hundred seventy-five (575) gallons) or more. Pursuant to 326 IAC 8-4-6(a)(8), diesel fuel and kerosene are not considered to be motor vehicle fuels. The insignificant fuel dispensing operations at this source dispense gasoline and petroleum motor vehicle fuels from tanks with capacities less than seventy-six (2,176) liters (five hundred seventy-five (575) gallons). Therefore, the requirements of 326 IAC 8-4-6 are not applicable.

Testing Requirements

There is still no testing specifically required by the permit.

Compliance Requirements

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

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

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

The woodworking has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the Classic travel trailer production line cabinet and milling area and assembly and final finish area stack exhausts, the Colorado travel trailer production line cabinet and milling area and assembly and final finish area stack exhausts, and the wood waste grinding stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that

specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the Classic travel trailer production line assembly and final finish woodworking (B3 and B4), Colorado travel trailer production line cabinet and milling area (P3), Colorado travel trailer production line assembly and final finish area (B6 through B10), and the wood waste grinding (P4) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.
 - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouses pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or tribo-flows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (d) An inspection shall be performed each calendar quarter of all cyclones (P1 and P2) controlling the Classic travel trailer production line cabinet and milling area woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
- (e) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the two (2) cyclones, identified as P1 and P2, and the nine (9) baghouses, identified as P3, P4, B3, B4, B6, B7, B8, B9 and B10, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP), and to ensure that 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) are not applicable.

The use of baghouses B1, B2, B5 and B11 are not required for compliance with any rule or limitation in the permit. Therefore, there are no compliance monitoring requirements for baghouses B1, B2, B5 and B11.

Conclusion

The operation of this travel trailer manufacturing source shall be subject to the conditions of the **FESOP 039-19844-00376**.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Dutchmen Manufacturing, Inc.
Source Location: 2021 Kercher Road, 2142 Caragana Ct. and 2410 Dierdorff Rd.,
 Goshen, Indiana 46526
County: Elkhart
FESOP: F 039-19844-00376
SIC Code: 3792
Permit Reviewer: CarrieAnn Paukowits

On September 10, 2005, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Dutchmen Manufacturing, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to continue to operate a stationary travel trailer manufacturing source with cyclones and baghouses as controls. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

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

Change 1:

The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The following changes have been made.

Section C:

Condition C.1 has been revised to remove (a), which contained the requirements of the previous version of 326IAC 6-3, as follows:

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

(a) ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.~~

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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.

Section D.1:

Condition D.1.3, which contained the requirements of the previous version of the rule, has been removed. Under the rule revision, the coating operations are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(14), because the unrestricted PM emissions are less than 0.551 pounds per hour. The remainder of Section D.1 has been renumbered accordingly. Thus, references to conditions in Section D.1 have been revised.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

~~Pursuant to FESOP 039-11273-00376, issued on December 6, 1999, and 40 CFR 52, Subpart P, the particulate matter (PM) from all coating operations shall be limited by the following:~~

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

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

D.1.87 Particulate Control

- (a) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the cyclone identified as P1, for particulate control, shall be in operation and control emissions from the cabinet and milling area woodworking processes at the Classic travel trailer production line at all times that the cabinet and milling area woodworking processes at the Classic travel trailer production line are in operation.
- (b) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the cyclone identified as P2, for particulate control, shall be in operation and control emissions from the two (2) jet pin routers at the cabinet and milling area of the Classic travel trailer production line at all times that the two (2) jet pin routers are in operation.
- (c) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the baghouse identified as B3, for particulate control, shall be in operation and control emissions from the two (2) miter saws for wood trims in the assembly and final finish area of the Classic travel trailer production line at all times that the two (2) miter saws are in operation.
- (d) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the baghouse identified as B4, for particulate control, shall be in operation and control emissions from the one (1) table saw in the assembly and final finish area of the Classic travel trailer production line at all times that the one (1) table saw is in operation.
- (e) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the baghouse identified as P3, for particulate control, shall be in operation and control emissions from the cabinet and milling area at the Colorado travel trailer production line at all times that the cabinet and milling area woodworking processes at the Colorado travel trailer production line are in operation.
- (f) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the baghouse identified as B6, for particulate control shall be in operation and control emissions from the two (2) miter saws for cutting wood trims at the assembly and final finish area of the Colorado travel trailer production line at all times that the two (2) miter saws are in operation.
- (g) In order to comply with Conditions **D.1.3 and D.1.4 and D.1.5**, the baghouse identified as B7, for particulate control shall be in operation and control emissions from the two (2) miter saws for cutting aluminum tubes and pipes at the assembly and final finish area of the Colorado travel trailer production line at all times that the two (2) miter saws are in operation.

- (h) In order to comply with Conditions **D.1.3 and D.1.4 and ~~D.1.5~~**, the baghouse identified as B8, for particulate control shall be in operation and control emissions from the one (1) miter saw for cutting ABS/PVC pipes at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) miter saw is in operation.
- (i) In order to comply with Conditions **D.1.3 and D.1.4 and ~~D.1.5~~**, the baghouse identified as B9, for particulate control shall be in operation and control emissions from the one (1) chop saw for cutting metal rods at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) chop saw is in operation.
- (j) In order to comply with Conditions **D.1.3 and D.1.4 and ~~D.1.5~~**, the baghouse identified as B10, for particulate control shall be in operation and control emissions from the one (1) band saw for cutting aluminum extrusions at the assembly and final finish area of the Colorado travel trailer production line at all times that the one (1) band saw is in operation.
- (k) In order to comply with Conditions **D.1.3 and D.1.4 and ~~D.1.5~~**, the baghouse identified as P4, for particulate control shall be in operation and control emissions from the wood waste minimization grinder at all times that the wood waste minimization grinder is in operation.

D.1.4413 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2(a), (b) and (c), 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 usage limits and the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month for each production line and total; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition ~~D.1.9~~ **D.1.8**, the Permittee shall maintain records of daily visible emission notations of the cyclone stack exhausts (P1 and P2) and baghouse stack exhausts (B3, B4, B6, B7, B8, B9, B10, P3 and P4).
- (c) To document compliance with Conditions ~~D.1.10~~ **D.1.9** and ~~D.1.12~~ **D.1.11**, the Permittee shall maintain records of the results of the inspections required under Conditions ~~D.1.10~~ **D.1.9** and ~~D.1.12~~ **D.1.11** and the dates the vents are redirected.
- (d) To document compliance with Condition ~~D.1.6~~ **D.1.5**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Sections A and D.2:

Condition D.2.1, which contained the requirements of the previous version of the rule, has been removed. Under the rule revision, the welding is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(9), because less than 625 pounds of wire and rod is consumed per day, and the torch cutting is exempt, pursuant to 326 IAC 6-3-1(b)(10), because this source cuts less than 3,400 inches per hour of stock one inch thickness or less. As a result, there are no conditions specifically applicable to the facilities in Section D.2. Therefore, Section D.2 has been removed from the permit, and Section A.4 is revised as follows:

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

-
- (a) The following welding and cutting operations: ~~[40 CFR 52, Subpart P]~~
- (1) Two (2) metal inert gas welding stations using steel wire, with a capacity of 0.354 pound per hour wire, each.
 - (2) Two (2) metal inert gas welding stations using aluminum wire, with a capacity of 0.1 pound per hour wire, each.
 - (3) Two (2) metal inert gas welding stations using silicone carbide wire, with a capacity of 0.02 pound per hour wire, each.
 - (4) Two (2) stick welding stations with a capacity of 0.12 pound per hour electrode.
 - (5) One (1) oxyacetylene cutting station, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
- (1) One (1) natural gas-fired radiant heater, identified as HW1, capacity: 0.150 million British thermal units per hour (mmBtu/hr).
 - (2) Two (2) natural gas-fired space heaters, identified as H6 and H7, capacity: 0.250 mmBtu/hr, each.
 - (3) One (1) natural gas-fired air circulator, identified as L1, in the lamination area, capacity: 0.400 mmBtu/hr.
 - (4) Two (2) natural gas-fired air circulators, identified as L2 and L3, in the lamination area, capacity: 0.580 mmBtu/hr, each.
 - (5) Two (2) natural gas-fired radiant heaters, identified as L4 and L5, in the lamination area, capacity: 0.100 mmBtu/hr, each.
- (c) One (1) hot-melt gluing operation, which includes a heating device, application device and an atmospheric humidifying system emitting only water vapor. Cleanup operation is accomplished by using absorbent and no solvents.
- (d) Diesel fuel above ground storage tank, with a capacity of 250 gallons and dispersing less

than 1,000 gallons per month.

- (e) Hydraulic oil storage tank, with a capacity of 250 gallons located inside the building.
- (f) 55-gallon containers of roof glue.
- (g) Paved and unpaved roads used for storing chassis frame and units.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) The following welding and cutting operations: [40 CFR 52, Subpart P]

- (1) Two (2) metal inert gas welding stations using steel wire, with a capacity of 0.354 pound per hour wire, each.
- (2) Two (2) metal inert gas welding stations using aluminum wire, with a capacity of 0.1 pound per hour wire, each.
- (3) Two (2) metal inert gas welding stations using silicone carbide wire, with a capacity of 0.02 pound per hour wire, each.
- (4) Two (2) stick welding stations with a capacity of 0.12 pound per hour electrode.
- (5) One (1) oxyacetylene cutting station, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.

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

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

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

Pursuant to FESOP 039-11273-00376, issued on December 6, 1999, and 40 CFR 52, Subpart P, the particulate matter (PM) from the coating operations shall be limited by the following:

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

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

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

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
2142 Caragana Court, Goshen, Indiana 46526
2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004

2021 Kercher Road

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency | Substrate Coated |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|----------------------|
| Classic Cabinet & Mill | | | | | | | | | | | | | | | | | |
| Mobilbond | 9.49 | 60.000% | 0.0% | 60.0% | 0.0% | 40.00% | 0.09000 | 1.750 | 5.69 | 5.69 | 0.90 | 21.52 | 3.93 | 0.00 | 14.24 | 100% | wood |
| Russel 676 | 5.70 | 82.800% | 0.0% | 82.8% | 0.0% | 12.00% | 0.00590 | 1.750 | 4.72 | 4.72 | 0.05 | 1.17 | 0.21 | 0.01 | 39.33 | 75% | wood |
| IPS Weld-on | 7.25 | 70.000% | 0.0% | 70.0% | 0.0% | 30.00% | 0.04400 | 1.750 | 5.08 | 5.08 | 0.39 | 9.38 | 1.71 | 0.00 | 16.92 | 100% | plastic |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00080 | 1.750 | 5.32 | 5.03 | 0.01 | 0.17 | 0.03 | 0.00 | N/A | 75% | metal, wood, plastic |
| Classic Slide-out Assembly | | | | | | | | | | | | | | | | | |
| 502 LSW lap sealant | 9.92 | 30.600% | 0.0% | 30.6% | 0.0% | 69.40% | 0.00350 | 1.750 | 3.04 | 3.04 | 0.02 | 0.45 | 0.08 | 0.00 | 4.37 | 100% | wood, plastic |
| Geocel 2300 sealant | 7.92 | 35.000% | 0.0% | 35.0% | 0.0% | 61.00% | 0.08380 | 1.750 | 2.77 | 2.77 | 0.41 | 9.76 | 1.78 | 0.00 | 4.54 | 100% | wood |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00020 | 1.750 | 5.32 | 5.03 | 0.00 | 0.04 | 0.01 | 0.00 | N/A | 75% | metal |
| 905 BA bonding cement | 8.20 | 51.000% | 50.5% | 0.5% | 50.5% | 49.00% | 0.14000 | 1.750 | 0.08 | 0.04 | 0.01 | 0.24 | 0.04 | 0.00 | 0.08 | 100% | wood |
| Quad advanced sealant | 9.80 | 25.000% | 0.0% | 25.0% | 0.0% | 60.00% | 0.13000 | 1.750 | 2.45 | 2.45 | 0.56 | 13.38 | 2.44 | 0.00 | 4.08 | 100% | wood |
| Classic Assembly & Final Finish | | | | | | | | | | | | | | | | | |
| Geocel 2300 sealant | 7.92 | 35.000% | 0.0% | 35.0% | 0.0% | 61.00% | 0.25040 | 1.750 | 2.77 | 2.77 | 1.21 | 29.15 | 5.32 | 0.00 | 4.54 | 100% | wood |
| Oatey PVC cement | 7.50 | 88.000% | 0.0% | 88.0% | 0.0% | 12.00% | 0.06000 | 1.750 | 6.60 | 6.60 | 0.69 | 16.63 | 3.04 | 0.00 | 55.00 | 100% | plastic |
| 502 LSW lap sealant | 9.92 | 30.600% | 0.0% | 30.6% | 0.0% | 69.40% | 2.50000 | 1.750 | 3.04 | 3.04 | 13.28 | 318.73 | 58.17 | 0.00 | 4.37 | 100% | wood, plastic |
| IPS Weld-on | 7.30 | 70.000% | 0.0% | 70.0% | 0.0% | 30.00% | 0.00500 | 1.750 | 5.11 | 5.11 | 0.04 | 1.07 | 0.20 | 0.00 | 17.03 | 100% | plastic |
| Russel 676 | 5.70 | 82.800% | 0.0% | 82.8% | 0.0% | 12.00% | 0.03680 | 0.750 | 4.72 | 4.72 | 0.13 | 3.13 | 0.57 | 0.03 | 39.33 | 75% | wood |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00020 | 1.750 | 5.32 | 5.03 | 0.00 | 0.04 | 0.01 | 0.00 | N/A | 75% | metal, wood, plastic |
| Oatey Cleaner | 6.58 | 100.000% | 20.0% | 80.0% | 15.0% | 0.00% | 0.00200 | 1.750 | 6.19 | 5.26 | 0.02 | 0.44 | 0.08 | 0.00 | N/A | 100% | plastic |
| Geocel 2000 sealant | 8.34 | 33.500% | 15.0% | 18.5% | 0.0% | 66.50% | 0.00790 | 1.750 | 1.54 | 1.54 | 0.02 | 0.51 | 0.09 | 0.00 | 2.32 | 100% | wood |
| Sikaflex 252 | 9.70 | 67.000% | 0.0% | 67.0% | 0.0% | 33.00% | 0.03000 | 1.750 | 6.50 | 6.50 | 0.34 | 8.19 | 1.49 | 0.00 | 19.69 | 100% | wood |
| Sikaflex 260 | 7.60 | 99.000% | 0.0% | 99.0% | 0.0% | 1.00% | 0.00400 | 1.750 | 7.52 | 7.52 | 0.05 | 1.26 | 0.23 | 0.00 | 752.40 | 100% | wood |
| Touch N Tone enamel | 5.56 | 99.000% | 20.0% | 79.0% | 15.0% | 1.00% | 0.08050 | 1.750 | 5.17 | 4.39 | 0.62 | 14.85 | 2.71 | 0.01 | 439.24 | 75% | wood |
| Brake Cleaner (C-111) | 6.34 | 100.000% | 26.0% | 74.0% | 34.3% | 0.00% | 0.00850 | 1.750 | 7.14 | 4.69 | 0.07 | 1.67 | 0.31 | 0.00 | N/A | 100% | equipment |
| Glass Cleaner C-31 | 8.26 | 99.860% | 87.0% | 12.9% | 83.7% | 0.20% | 0.00240 | 1.750 | 6.53 | 1.06 | 0.00 | 0.11 | 0.02 | 0.00 | 531.12 | 75% | glass |
| Crazy Clean 030 | 8.16 | 93.100% | 85.2% | 7.9% | 82.5% | 0.80% | 0.05420 | 1.750 | 3.68 | 0.64 | 0.06 | 1.47 | 0.27 | 0.06 | 80.58 | 75% | wood, plastic |
| Dupont lacquer thinner | 6.32 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00500 | 1.750 | 6.32 | 6.32 | 0.06 | 1.33 | 0.24 | 0.00 | N/A | 100% | wood, plastic |
| mineral spirits | 6.59 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00500 | 1.750 | 6.59 | 6.59 | 0.06 | 1.38 | 0.25 | 0.00 | N/A | 100% | wood, plastic |
| WD 40 | 6.67 | 78.000% | 0.0% | 78.0% | 0.0% | 30.00% | 0.00100 | 1.750 | 5.20 | 5.20 | 0.01 | 0.22 | 0.04 | 0.00 | 17.34 | 75% | wood |
| Touch-up/Repair | | | | | | | | | | | | | | | | | |
| Spray N Go | 6.67 | 78.000% | 2.0% | 76.0% | 2.0% | 22.00% | 0.02000 | 0.520 | 5.17 | 5.07 | 0.05 | 1.27 | 0.23 | 0.02 | 23.04 | 75% | metal |
| Centari acrylic enamel | 7.74 | 64.600% | 0.0% | 64.6% | 0.0% | 30.34% | 0.02000 | 0.520 | 5.00 | 5.00 | 0.05 | 1.25 | 0.23 | 0.03 | 16.48 | 75% | wood, plastic |
| Enamel reducers | 6.44 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.02000 | 0.520 | 6.44 | 6.44 | 0.07 | 1.61 | 0.29 | 0.00 | N/A | 75% | wood, plastic |
| Isocyanate activator | 8.07 | 74.000% | 9.0% | 65.0% | 8.7% | 28.40% | 0.02000 | 0.520 | 5.75 | 5.25 | 0.05 | 1.31 | 0.24 | 0.02 | 18.47 | 75% | wood, plastic |
| Chroma base clear | 7.17 | 96.370% | 0.0% | 96.4% | 0.0% | 2.74% | 0.00500 | 0.520 | 6.91 | 6.91 | 0.02 | 0.43 | 0.08 | 0.00 | 252.18 | 75% | wood, plastic |
| Chroma one binder | 7.10 | 99.980% | 0.0% | 99.98% | 0.0% | 0.02% | 0.00500 | 0.520 | 7.10 | 7.10 | 0.02 | 0.44 | 0.08 | 0.00 | N/A | 75% | wood, plastic |
| | | | | | | | | | | | | | 1.15 | 0.073 | | | |

PM Control Efficiency: 0.00%

State Potential Emissions

Add worst case coating to all solvents

| | | | | |
|---------------------|-------------|------------|-------------|--------------|
| Uncontrolled | 19.3 | 463 | 84.4 | 0.184 |
| Controlled | 19.3 | 463 | 84.4 | 0.184 |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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

**Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
2142 Caragana Court, Goshen, Indiana 46526
2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004**

2142 Caragana Court

| Material | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency | Substrate Coated |
|---|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|----------------------|
| Colorado Cabinet & Mill | | | | | | | | | | | | | | | | | |
| Mobilbond | 9.49 | 60.000% | 0.0% | 60.0% | 0.0% | 40.00% | 0.09000 | 1.250 | 5.69 | 5.69 | 0.64 | 15.37 | 2.81 | 0.00 | 14.24 | 100% | wood |
| Russel 676 | 5.70 | 82.800% | 0.0% | 82.8% | 0.0% | 12.00% | 0.00590 | 1.250 | 4.72 | 4.72 | 0.03 | 0.84 | 0.15 | 0.01 | 39.33 | 75% | wood |
| IPS Weld-on | 7.25 | 70.000% | 0.0% | 70.0% | 0.0% | 30.00% | 0.04400 | 1.250 | 5.08 | 5.08 | 0.28 | 6.70 | 1.22 | 0.00 | 16.92 | 100% | plastic |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00030 | 1.250 | 5.32 | 5.03 | 0.00 | 0.05 | 0.01 | 0.00 | N/A | 75% | metal, wood, plastic |
| Colorado Slide-out Assembly | | | | | | | | | | | | | | | | | |
| 502 LSW lap sealant | 9.92 | 30.600% | 0.0% | 30.6% | 0.0% | 69.40% | 0.00350 | 1.250 | 3.04 | 3.04 | 0.01 | 0.32 | 0.06 | 0.00 | 4.37 | 100% | wood, plastic |
| Geocel 2300 sealant | 7.92 | 35.000% | 0.0% | 35.0% | 0.0% | 61.00% | 0.08380 | 1.250 | 2.77 | 2.77 | 0.29 | 6.97 | 1.27 | 0.00 | 4.54 | 100% | wood |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00020 | 1.250 | 5.32 | 5.03 | 0.00 | 0.03 | 0.01 | 0.00 | N/A | 75% | metal |
| 905 BA bonding cement | 8.20 | 51.000% | 50.5% | 0.5% | 50.5% | 49.00% | 0.14000 | 1.250 | 0.08 | 0.04 | 0.01 | 0.17 | 0.03 | 0.00 | 0.08 | 100% | wood |
| Quad advanced sealant | 9.80 | 25.000% | 0.0% | 25.0% | 0.0% | 60.00% | 0.13000 | 1.250 | 2.45 | 2.45 | 0.40 | 9.56 | 1.74 | 0.00 | 4.08 | 100% | wood |
| Colorado Assembly & Final Finish | | | | | | | | | | | | | | | | | |
| Geocel 2300 sealant | 7.92 | 35.000% | 0.0% | 35.0% | 0.0% | 61.00% | 0.25040 | 1.250 | 2.77 | 2.77 | 0.87 | 20.82 | 3.80 | 0.00 | 4.54 | 100% | wood |
| Oatey PVC cement | 7.50 | 88.000% | 0.0% | 88.0% | 0.0% | 12.00% | 0.06000 | 1.250 | 6.60 | 6.60 | 0.50 | 11.88 | 2.17 | 0.00 | 55.00 | 100% | plastic |
| 502 LSW lap sealant | 9.92 | 30.600% | 0.0% | 30.6% | 0.0% | 69.40% | 2.50000 | 1.250 | 3.04 | 3.04 | 9.49 | 227.66 | 41.55 | 0.00 | 4.37 | 100% | wood, plastic |
| IPS Weld-on | 7.30 | 70.000% | 0.0% | 70.0% | 0.0% | 30.00% | 0.00500 | 1.250 | 5.11 | 5.11 | 0.03 | 0.77 | 0.14 | 0.00 | 17.03 | 100% | plastic |
| Russel 676 | 5.70 | 82.800% | 0.0% | 82.8% | 0.0% | 12.00% | 0.03680 | 1.250 | 4.72 | 4.72 | 0.22 | 5.21 | 0.95 | 0.05 | 39.33 | 75% | wood |
| Cyclo silicone | 5.92 | 92.500% | 7.5% | 85.0% | 5.3% | 0.00% | 0.00020 | 1.250 | 5.32 | 5.03 | 0.00 | 0.03 | 0.01 | 0.00 | N/A | 75% | metal, wood, plastic |
| Oatey Cleaner | 6.58 | 100.000% | 20.0% | 80.0% | 15.0% | 0.00% | 0.00200 | 1.250 | 6.19 | 5.26 | 0.01 | 0.32 | 0.06 | 0.00 | N/A | 100% | plastic |
| Geocel 2000 sealant | 8.34 | 33.500% | 15.0% | 18.5% | 0.0% | 66.50% | 0.00790 | 1.250 | 1.54 | 1.54 | 0.02 | 0.37 | 0.07 | 0.00 | 2.32 | 100% | wood |
| Sikaflex 252 | 9.70 | 67.000% | 0.0% | 67.0% | 0.0% | 33.00% | 0.03000 | 1.250 | 6.50 | 6.50 | 0.24 | 5.85 | 1.07 | 0.00 | 19.69 | 100% | wood |
| Sikaflex 260 | 7.60 | 99.000% | 0.0% | 99.0% | 0.0% | 1.00% | 0.00400 | 1.250 | 7.52 | 7.52 | 0.04 | 0.90 | 0.16 | 0.00 | 752.40 | 100% | wood |
| Touch N Tone enamel | 5.56 | 99.000% | 20.0% | 79.0% | 15.0% | 1.00% | 0.08050 | 1.250 | 5.17 | 4.39 | 0.44 | 10.61 | 1.94 | 0.01 | 439.24 | 75% | wood |
| Brake Cleaner (C-111) | 6.34 | 100.000% | 26.0% | 74.0% | 34.3% | 0.00% | 0.00850 | 1.750 | 7.14 | 4.69 | 0.07 | 1.67 | 0.31 | 0.00 | N/A | 100% | equipment |
| Glass Cleaner C-31 | 8.26 | 99.860% | 87.0% | 12.9% | 83.7% | 0.20% | 0.00240 | 1.250 | 6.53 | 1.06 | 0.00 | 0.08 | 0.01 | 0.00 | 531.12 | 75% | glass |
| Crazy Clean 030 | 8.16 | 93.100% | 85.2% | 7.9% | 82.5% | 0.80% | 0.05420 | 1.250 | 3.68 | 0.64 | 0.04 | 1.05 | 0.19 | 0.04 | 80.58 | 75% | wood, plastic |
| Dupont lacquer thinner | 6.32 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00500 | 1.250 | 6.32 | 6.32 | 0.04 | 0.95 | 0.17 | 0.00 | N/A | 100% | wood, plastic |
| mineral spirits | 6.59 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00500 | 1.250 | 6.59 | 6.59 | 0.04 | 0.99 | 0.18 | 0.00 | N/A | 100% | wood, plastic |
| WD 40 | 6.67 | 78.000% | 0.0% | 78.0% | 0.0% | 30.00% | 0.00100 | 1.250 | 5.20 | 5.20 | 0.01 | 0.16 | 0.03 | 0.00 | 17.34 | 75% | wood |
| Touch-up/Repair | | | | | | | | | | | | | | | | | |
| Spray N Go | 6.67 | 78.000% | 2.0% | 76.0% | 2.0% | 22.00% | 0.02000 | 0.380 | 5.17 | 5.07 | 0.04 | 0.92 | 0.17 | 0.01 | 23.04 | 75% | metal |
| Centari acrylic enamel | 7.74 | 64.600% | 0.0% | 64.6% | 0.0% | 30.34% | 0.02000 | 0.380 | 5.00 | 5.00 | 0.04 | 0.91 | 0.17 | 0.02 | 16.48 | 75% | wood, plastic |
| Enamel reducers | 6.44 | 100.000% | 0.0% | 100.0% | 0.0% | 0.00% | 0.02000 | 0.380 | 6.44 | 6.44 | 0.05 | 1.17 | 0.21 | 0.00 | N/A | 75% | wood, plastic |
| Isocyanate activator | 8.07 | 74.000% | 9.0% | 65.0% | 8.7% | 28.40% | 0.02000 | 0.380 | 5.75 | 5.25 | 0.04 | 0.96 | 0.17 | 0.02 | 18.47 | 75% | wood, plastic |
| Chroma base clear | 7.17 | 96.370% | 0.0% | 96.4% | 0.0% | 2.74% | 0.00500 | 0.380 | 6.91 | 6.91 | 0.01 | 0.32 | 0.06 | 0.00 | 252.18 | 75% | wood, plastic |
| Chroma one binder | 7.10 | 99.980% | 0.0% | 99.98% | 0.0% | 0.02% | 0.00500 | 0.380 | 7.10 | 7.10 | 0.01 | 0.32 | 0.06 | 0.00 | N/A | 75% | wood, plastic |
| | | | | | | | | | | | | | 0.841 | 0.053 | | | |

PM Control Efficiency: 0.00%

State Potential Emissions

Add worst case coating to all solvents

| | | | | |
|---------------------|-------------|------------|-------------|--------------|
| Uncontrolled | 13.9 | 334 | 60.9 | 0.161 |
| Controlled | 13.9 | 334 | 60.9 | 0.161 |

METHODOLOGY

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

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

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
2142 Caragana Court, Goshen, Indiana 46526
2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004

2410 Dierdorff Rd.

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency | Substrate Coated |
|------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|------------------|
| Wall Lamination | | | | | | | | | | | | | | | | | |
| Perfect Lok | 8.80 | 0.000% | 0.0% | 0.0% | 0.0% | 100.00% | 5.61800 | 2.500 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% | wood |
| Dynasolve Cleaner | 8.84 | 97.060% | 0.0% | 97.1% | 0.0% | 2.94% | 0.02700 | 2.500 | 8.58 | 8.58 | 0.58 | 13.90 | 2.54 | 0.00 | 291.84 | 100% | not a coating |
| HM 738 hot melt | 8.00 | 0.000% | 0.0% | 0.0% | 0.0% | 100.00% | 0.01380 | 2.500 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% | wood |
| MC Urethane adhesive | 9.00 | 0.000% | 0.0% | 0.0% | 0.0% | 100.00% | 0.29560 | 1.670 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% | wood |
| Enerbond SF-Ener 45 | 10.01 | 0.000% | 0.0% | 0.0% | 0.0% | 100.00% | 0.01400 | 1.670 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.26 | 0.00 | 75% | wood |
| Parts & Brakes Clean | 6.34 | 100.000% | 26.0% | 74.0% | 34.3% | 0.00% | 0.00540 | 2.500 | 7.14 | 4.69 | 0.06 | 1.52 | 0.28 | 0.00 | N/A | 100% | not a coating |

PM Control Efficiency: 0.00%

State Potential Emissions

Add worst case coating to all solvents

| | | | | |
|---------------------|--------------|-------------|-------------|--------------|
| Uncontrolled | 0.642 | 15.4 | 2.81 | 0.256 |
| Controlled | 0.642 | 15.4 | 2.81 | 0.256 |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Dutchmen Manufacturing, Inc.
 Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
 FESOP Renewal: 039-19844-00376
 Reviewer: CarrieAnn Paukowitz/MES
 Application Date: August 18, 2004

2021 Kercher Road

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Toluene | Weight % Hexane | Weight % MEK | Weight % Vinyl acetate | Weight % Xylene | Weight % Ethyl benzen | Weight % Cumene | Weight % Methanol | Weight % Glycol Ethers | Weight % Napthalene | Toluene Emissions (ton/yr) | Hexane Emissions (ton/yr) | MEK Emissions (ton/yr) | Vinyl acetate Emissions (ton/yr) | Xylene Emissions (ton/yr) | Ethyl benzene Emissions (ton/yr) | Cumene Emissions (ton/yr) | Methanol Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) | Napthalene Emissions (ton/yr) | Total Emissions (ton/yr) | |
|--|------------------|--------------------------------|---------------------|------------------|-----------------|--------------|------------------------|-----------------|-----------------------|-----------------|-------------------|------------------------|---------------------|----------------------------|---------------------------|------------------------|----------------------------------|---------------------------|----------------------------------|---------------------------|-----------------------------|----------------------------------|-------------------------------|--------------------------|------|
| Classic Cabinet & Mill | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mobilbond | 9.49 | 0.09000 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Russel 676 | 5.70 | 0.00590 | 1.750 | 0.00% | 35.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| IPS Weld-on | 7.25 | 0.04400 | 1.750 | 0.00% | 0.00% | 75.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 1.83 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.83 |
| Cyclo silicone | 5.92 | 0.00080 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Classic Slide-out Assembly | | | | | | | | | | | | | | | | | | | | | | | | | |
| 502 LSW lap sealant | 9.92 | 0.00350 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Geocel 2300 sealant | 7.92 | 0.08380 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cyclo silicone | 5.92 | 0.00020 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 905 BA bonding cement | 8.20 | 0.14000 | 1.750 | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Quad advanced sealant | 9.80 | 0.13000 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 15.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 1.46 | 0.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.95 |
| Classic Assembly & Final Finish | | | | | | | | | | | | | | | | | | | | | | | | | |
| Geocel 2300 sealant | 7.92 | 0.25040 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Oatey PVC cement | 7.50 | 0.06000 | 1.750 | 0.00% | 0.00% | 55.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 1.90 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.90 |
| 502 LSW lap sealant | 9.92 | 2.50000 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| IPS Weld-on | 7.30 | 0.00500 | 1.750 | 0.00% | 0.00% | 75.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.21 |
| Russel 676 | 5.70 | 0.03680 | 1.750 | 0.00% | 35.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.24 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.24 |
| Cyclo silicone | 5.92 | 0.00020 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Oatey Cleaner | 6.58 | 0.00200 | 1.750 | 0.00% | 0.00% | 80.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 |
| Geocel 2000 sealant | 8.34 | 0.00790 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 7.00% | 0.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 |
| Sikaflex 252 | 9.70 | 0.03000 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 |
| Sikaflex 260 | 7.60 | 0.00400 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 99.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.23 | 0.00 | 0.00 | 0.00 | 0.23 |
| Touch N Tone enamel | 5.56 | 0.08050 | 1.750 | 15.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.51 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.51 |
| Brake Cleaner (C-111) | 6.34 | 0.00850 | 1.750 | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.12 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.12 |
| Glass Cleaner C-31 | 8.26 | 0.00240 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.01 |
| Crazy Clean 030 | 8.16 | 0.05420 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dupont lacquer thinner | 6.32 | 0.00500 | 1.750 | 2.00% | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| mineral spirits | 6.59 | 0.00500 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WD 40 | 6.67 | 0.00100 | 1.750 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Touch-up/Repair | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spray N Go | 6.67 | 0.02000 | 0.520 | 20.00% | 0.00% | 10.00% | 0.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.06 | 0.00 | 0.03 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 |
| Centari acrylic enamel | 7.74 | 0.02000 | 0.520 | 17.00% | 0.00% | 0.00% | 0.00% | 6.00% | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.06 | 0.00 | 2.00 | 0.00 | 0.02 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Enamel reducers | 6.44 | 0.02000 | 0.520 | 6.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.00% | 1.00% | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.03 |
| Isocyanate activator | 8.07 | 0.02000 | 0.520 | 0.00% | 0.00% | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 |
| Chroma base clear | 7.17 | 0.00500 | 0.520 | 28.00% | 0.00% | 28.00% | 0.00% | 16.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.02 | 0.00 | 0.02 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 |
| Chroma one binder | 7.10 | 0.00500 | 0.520 | 0.00% | 0.00% | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 |
| Total State Potential Emissions | | | | | | | | | | | | | | 0.805 | 0.331 | 4.21 | 0.088 | 1.66 | 0.495 | 0.015 | 0.231 | 0.013 | 0.003 | 7.85 | |

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Dutchmen Manufacturing, Inc.
 Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
 FESOP Renewal: 039-19844-00376
 Reviewer: CarrieAnn Paukowits/MES
 Application Date: August 18, 2004

2142 Caragana Court

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Toluene | Weight % Hexane | Weight % MEK | Weight % Vinyl acetate | Weight % Xylene | Weight % Ethyl benzen | Weight % Cumene | Weight % Methanol | Weight % Glycol Ethers | Weight % Napthalene | Toluene Emissions (ton/yr) | Hexane Emissions (ton/yr) | MEK Emissions (ton/yr) | Vinyl acetate Emissions (ton/yr) | Xylene Emissions (ton/yr) | Ethyl benzene Emissions (ton/yr) | Cumene Emissions (ton/yr) | Methanol Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) | Napthalene Emissions (ton/yr) | Total Emissions (ton/yr) | |
|---|------------------|--------------------------------|---------------------|------------------|-----------------|--------------|------------------------|-----------------|-----------------------|-----------------|-------------------|------------------------|---------------------|----------------------------|---------------------------|------------------------|----------------------------------|---------------------------|----------------------------------|---------------------------|-----------------------------|----------------------------------|-------------------------------|--------------------------|------|
| Colorado Cabinet & Mill | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mobilbond | 9.49 | 0.09000 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Russel 676 | 5.70 | 0.00590 | 1.250 | 0.00% | 35.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 |
| IPS Weld-on | 7.25 | 0.04400 | 1.250 | 0.00% | 0.00% | 75.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 1.31 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.31 |
| Cyclo silicone | 5.92 | 0.00030 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Colorado Slide-out Assembly | | | | | | | | | | | | | | | | | | | | | | | | | |
| 502 LSW lap sealant | 9.92 | 0.00350 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Geocel 2300 sealant | 7.92 | 0.08380 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cyclo silicone | 5.92 | 0.00020 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 905 BA bonding cement | 8.20 | 0.14000 | 1.250 | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 |
| Quad advanced sealant | 9.80 | 0.13000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 15.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 1.05 | 0.35 | 0.00 | 0.00 | 0.00 | 0.00 | 1.40 | |
| Colorado Assembly & Final Finish | | | | | | | | | | | | | | | | | | | | | | | | | |
| Geocel 2300 sealant | 7.92 | 0.25040 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Qatey PVC cement | 7.50 | 0.06000 | 1.250 | 0.00% | 0.00% | 55.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 1.36 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.36 |
| 502 LSW lap sealant | 9.92 | 2.50000 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| IPS Weld-on | 7.30 | 0.00500 | 1.250 | 0.00% | 0.00% | 75.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.15 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.15 |
| Russel 676 | 5.70 | 0.03680 | 1.250 | 0.00% | 35.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.40 |
| Cyclo silicone | 5.92 | 0.00020 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Qatey Cleaner | 6.58 | 0.00200 | 1.250 | 0.00% | 0.00% | 80.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 |
| Geocel 2000 sealant | 8.34 | 0.00790 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 7.00% | 0.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 |
| Sikaflex 252 | 9.70 | 0.03000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 |
| Sikaflex 260 | 7.60 | 0.00400 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 99.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.00 | 0.00 | 0.16 |
| Touch N Tone enamel | 5.56 | 0.08050 | 1.250 | 15.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.37 |
| Brake Cleaner (C-111) | 6.34 | 0.00850 | 1.250 | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Glass Cleaner C-31 | 8.26 | 0.00240 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.01 |
| Crazy Clean 030 | 8.16 | 0.05420 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dupont lacquer thinner mineral spirits | 6.32 | 0.00500 | 1.250 | 2.00% | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WD 40 | 6.67 | 0.00100 | 1.250 | 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 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Touch-up/Repair | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spray N Go | 6.67 | 0.02000 | 0.380 | 20.00% | 0.00% | 10.00% | 0.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.04 | 0.00 | 0.02 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 |
| Centari acrylic enamel | 7.74 | 0.02000 | 0.380 | 17.00% | 0.00% | 0.00% | 0.00% | 6.00% | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.04 | 0.00 | 0.00 | 0.00 | 0.02 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 |
| Enamel reducers | 6.44 | 0.02000 | 0.380 | 6.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.00% | 1.00% | 0.00% | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 |
| Isocyanate activator | 8.07 | 0.02000 | 0.380 | 0.00% | 0.00% | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 |
| Chroma base clear | 7.17 | 0.00500 | 0.380 | 28.00% | 0.00% | 28.00% | 0.00% | 16.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.02 | 0.00 | 0.02 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 |
| Chroma one binder | 7.10 | 0.00500 | 0.380 | 0.00% | 0.00% | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 |
| Total State Potential Emissions | | | | | | | | | | | | | | 0.577 | 0.466 | 3.01 | 0.063 | 1.19 | 0.354 | 0.011 | 0.165 | 0.010 | 0.002 | 5.84 | |

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004

2410 Dierdorff Rd.

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Toluene | Toluene Emissions (ton/yr) |
|------------------------|------------------|--------------------------------|---------------------|------------------|----------------------------|
| Wall Lamination | | | | | |
| Purfect Lok | 8.80 | 5.61800 | 2.500 | 0.00% | 0.000 |
| Dynasolve Cleaner | 8.84 | 0.02700 | 2.500 | 0.00% | 0.000 |
| HM 738 hot melt | 8.00 | 0.01380 | 2.500 | 0.00% | 0.000 |
| MC Urethane adhesive | 9.00 | 0.29560 | 1.670 | 0.00% | 0.000 |
| Enerbond SF-Ener 45 | 10.01 | 0.01400 | 1.670 | 0.00% | 0.000 |
| Parts & Brakes Clean | 6.34 | 0.00540 | 2.500 | 30.00% | 0.112 |

Total State Potential Emissions **0.112**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8

MDI Emission Calculations

| Material | Weight % MDI | Process Temperature (Tproc) (K) | Vapor Pressure MDI @ Process Temperature (VPmdi) (atm) | Molecular Weight MDI (Mw) | Roller Surface Area (sq ft) | Air Velocity (Vair) (cfm) | Ventilation Rate (u) (m/s) | Exposed Surface Area (SA) (sq. m)/day | Tack Free time (tTF) (s) | Evaporation Loss (W) (grams/day) | Potential to Emit (tons/yr) |
|-----------------------------|--------------|---------------------------------|--|---------------------------|-----------------------------|---------------------------|----------------------------|---------------------------------------|--------------------------|----------------------------------|-----------------------------|
| Purfect Lok adhesive (9014) | 2.00% | 408 | 5.99E-06 | 254.38 | 5 | 401 | 4.411 | 10046.90203 | 5 | 15.16437152 | 0.006 |
| MC Urethane adhesive | 15.00% | 408 | 5.99E-06 | 254.38 | 5 | 401 | 4.411 | 10046.90203 | 5 | 15.16437152 | 0.006 |
| Enerbond SF-Ener 45 | 60.00% | 408 | 5.99E-06 | 254.38 | 5 | 401 | 4.411 | 10046.90203 | 5 | 15.16437152 | 0.006 |

0.018

Methodology

Temperature in Kelvin (K) = (Temperature in Fahrenheit - 32)/1.8 + 273.15

Emission calculation methodology developed by the Alliance for the Polyurethane Industry (API)

For adhesives or coatings (closed process):

$W=25.4 \times VPmdi \times (Mw/Tproc) \times u^{0.78} \times SA \times tTF$

**Appendix A: Emission Calculations
Woodworking Operations**

Company Name: Dutchmen Manufacturing, Inc.
 Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
 FESOP Renewal: 039-19844-00376
 Reviewer: CarrieAnn Paukowits/MES
 Application Date: August 18, 2004

| Unit ID | Control Efficiency (%) | Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.) | Gas or Air Flow Rate (acfm.) | PM Emission Rate before Controls (lb/hr) | PM Emission Rate before Controls (tons/yr) | PM Emission Rate after Controls (lb/hr) | PM Emission Rate after Controls (tons/yr) |
|--|------------------------|---|------------------------------|--|--|---|---|
| 2021 Kercher Road | | | | | | | |
| Classic Line Cabinet and Mill Cyclone/Dust | 99.90% | 0.00286 | 6005 | 147 | 644 | 0.147 | 0.644 |
| Cabinet and Mill Cyclone/Dust Collector P2 | 99.00% | 0.00220 | 2725 | 5.14 | 22.5 | 0.051 | 0.225 |
| Cabinet and Mill Mitre Saw Baghouse B1 | 99.00% | 0.00048 | 1120 | 0.461 | 2.02 | 0.005 | 0.020 |
| Cabinet and Mill Mitre Saw Baghouse B2 | 99.00% | 0.00048 | 1120 | 0.461 | 2.02 | 0.005 | 0.020 |
| Assembly and Final Finish Baghouse B3 | 99.00% | 0.00048 | 1120 | 0.461 | 2.02 | 0.005 | 0.020 |
| Assembly and Final Finish Baghouse B4 | 99.00% | 0.00048 | 1120 | 0.461 | 2.02 | 0.005 | 0.020 |
| 2142 Caragana Court | | | | | | | |
| Colorado Line Cabinet and Mill baghouse (P3) | 99.98% | 0.00087 | 8510 | 317 | 1390 | 0.063 | 0.278 |
| Slide-out Assembly Baghouse B5 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Assembly and Final Finish Baghouse B6 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Assembly and Final Finish Baghouse B7 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Assembly and Final Finish Baghouse B8 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Assembly and Final Finish Baghouse B9 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Assembly and Final Finish Baghouse B10 | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| 2410 Dierdorff Road | | | | | | | |
| Wall Lamination Baghouse (B11) | 99.00% | 0.00048 | 650 | 0.267 | 1.17 | 0.003 | 0.012 |
| Heavy Duty Baghouse (Wood waste grinding) | 99.98% | 0.00044 | 10000 | 187 | 820 | 0.037 | 0.164 |
| Totals: | | | | 661 | 2893 | 0.337 | 1.47 |

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)
 PM = PM10

Uncontrolled emissions

| Process | Capacity (lbs/hr) | PM Emission Factor (lb/ton) | PM10 Emission Factor (lb/ton) | Potential PM Emissions (lbs/hr) | Potential PM10 Emissions (lbs/hr) | Potential PM Emissions (tons/yr) | Potential PM10 Emissions (tons/yr) |
|---|-------------------|-----------------------------|-------------------------------|---------------------------------|-----------------------------------|----------------------------------|------------------------------------|
| Classic Line | | | | | | | |
| Assembly and Final Finish Metal working (including PVC cutting) | 16 | 0.35 | 0.2 | 0.003 | 0.002 | 0.012 | 0.007 |

Methodology
 Emission factors from FIRES 6.23, 3-07-008-02 for lumber sawing/cutting is the closest emission factor compatible with these processes.
 PM/PM10 Emissions (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton)
 PM/PM10 Emissions (tons/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 lb/2,000 tons

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

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.41

21.1

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-------|-------------|-------|-------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.90 | 7.60 | 0.600 | 100 | 5.50 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.020 | 0.080 | 0.006 | 1.06 | 0.058 | 0.887 |

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

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

| Emission Factor in lb/MMcf | HAPs - Organics | | | | |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 0.00210 | 0.00120 | 0.07500 | 1.80000 | 0.00340 |
| Potential Emission in tons/yr | 0.00002 | 0.00001 | 0.00079 | 0.01900 | 0.00004 |

| Emission Factor in lb/MMcf | HAPs - Metals | | | | | Total |
|-------------------------------|---------------|---------|----------|-----------|---------|--------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | |
| | 0.0005 | 0.0011 | 0.0014 | 0.0004 | 0.0021 | |
| Potential Emission in tons/yr | 0.00001 | 0.00001 | 0.00001 | 0.000004 | 0.00002 | 0.020 |

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 2021 Kercher Road, Goshen, Indiana 46526
 2142 Caragana Court, Goshen, Indiana 46526
 2410 Dierdorff Road, Goshen, Indiana 46526
FESOP Renewal: 039-19844-00376
Reviewer: CarrieAnn Paukowits/MES
Application Date: August 18, 2004

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|-------------------------------------|--------------------|---|--------------------------------------|---|--------|--------|--------|-----------------------|-------|-------|-------|------------------|
| | | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| WELDING | | | | | | | | | | | | |
| Metal Inert Gas (MIG)(carbon steel) | 2 | 0.354 | | 0.0055 | 0.0005 | | | 0.004 | 0.000 | 0.000 | 0 | 0.000 |
| Metal Inert Gas (MIG)(carbon steel) | 2 | 0.1 | | 0.0055 | 0.0005 | | | 0.001 | 0.000 | 0.000 | 0 | 0.000 |
| Metal Inert Gas (MIG)(carbon steel) | 2 | 0.02 | | 0.0055 | 0.0005 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 |
| Metal Inert Gas (MIG)(carbon steel) | 2 | 0.354 | | 0.0055 | 0.0005 | | | 0.004 | 0.000 | 0.000 | 0 | 0.000 |
| Stick (E7018 electrode) | 2 | 0.12 | | 0.0211 | 0.0009 | | | 0.005 | 0.000 | 0.000 | 0 | 0.000 |
| Oxyacetylene(carbon steel) | 0 | 0 | | 0.0055 | 0.0005 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| FLAME CUTTING | Number of Stations | Max. Metal Thickness Cut (in.) | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)** | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
| | | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| Oxyacetylene | 1 | 0.375 | 0.167 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.001 | 0.000 | 0.000 | 0.000 | 0.000 |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| EMISSION TOTALS | | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | | 0.015 | 0.001 | 0.000 | 0.000 | 0.001 |
| Potential Emissions lbs/day | | | | | | | | 0.355 | 0.025 | 0.000 | 0.000 | 0.025 |
| Potential Emissions tons/year | | | | | | | | 0.065 | 0.005 | 0.000 | 0.000 | 0.005 |

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

