



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: May 10, 2007  
RE: All American Homes of Indiana, LLC / 001-21282-00049  
FROM: Nisha Sizemore  
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 03/23/06



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

## Minor Source Operating Permit OFFICE OF AIR QUALITY

**All American Homes of Indiana LLC  
1418 South 13th Street  
Decatur, Indiana 46733**

(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.

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

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M001-21282-00049	
Issued by: Original signed by  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 10, 2007  Expiration Date: May 10, 2012

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1    General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2    Emission Units and Pollution Control Equipment Summary	
<b>B. GENERAL CONDITIONS .....</b>	<b>6</b>
B.1    Definitions [326 IAC 2-1.1-1]	
B.2    Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3    Term of Conditions [326 IAC 2-1.1-9.5]	
B.4    Enforceability	
B.5    Severability	
B.6    Property Rights or Exclusive Privilege	
B.7    Duty to Provide Information	
B.8    Certification	
B.9    Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10   Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11   Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12   Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13   Permit Renewal [326 IAC 2-6.1-7]	
B.14   Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15   Source Modification Requirement	
B.16   Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17   Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18   Annual Fee Payment [326 IAC 2-1.1-7]	
B.19   Credible Evidence [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>11</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1    Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2    Permit Revocation [326 IAC 2-1.1-9]	
C.3    Opacity [326 IAC 5-1]	
C.4    Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5    Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6    Fugitive Dust Emissions [326 IAC 6-4]	
C.7    Stack Height [326 IAC 1-7]	
C.8    Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.9    Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10   Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.11   Compliance Monitoring [326 IAC 2-1.1-11]	
C.12   Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.13   Instrument Specifications [326 IAC 2-1.1-11]	
<b>Corrective Actions and Response Steps</b>	
C.14   Response to Excursions or Exceedances	
C.15   Actions Related to Noncompliance Demonstrated by a Stack Test	
<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.16   Malfunctions Report [326 IAC 1-6-2]	

- C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]  
[IC 13-14-1-13]

**D.1 FACILITY OPERATION CONDITIONS - Surface Coating and Caulking Operations.....17**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating)[326 IAC 6-3-2(d)]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.4 Volatile Organic Compounds (VOC)
- D.1.5 VOC Emissions

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.6 Record Keeping Requirements
- D.1.7 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - Woodworking operation .....19**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.3 Particulate

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.4 Visible Emissions Notations
- D.2.5 Parametric Monitoring
- D.2.6 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.7 Record Keeping Requirements

**D.3 FACILITY OPERATION CONDITIONS - Insignificant Activity - Degreasing .....21**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Certification Form .....	23
Quarterly Report.....	22
Annual Notification .....	23
Malfunction Report .....	24

## SECTION A SOURCE SUMMARY

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

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

---

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

Source Address:	1418 South 13th Street, Decatur, Indiana 46733
Mailing Address:	1418 South 13th Street, Decatur, IN 46733
General Source Phone Number:	260-724-9171
SIC Code:	2452
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;
- (c) One (1) woodworking operation at Plant 1 constructed in 1970, processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
  - (1) Fifty-eight (58) natural gas-fired heaters, each having a maximum heat input rating of 0.10 MMBtu per hour;
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary

protective coatings.

- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes.
- (j) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Paved and unpaved roads and parking lots with public access.

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

---

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 2-1.1-1) shall prevail.

### B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, M001-21282-00049, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

---

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability

---

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 Severability

---

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.6 Property Rights or Exclusive Privilege

---

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

### B.7 Duty to Provide Information

---

- (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 an "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.8 Certification

---

- (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.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

---

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

---

- (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) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to M001-21282-00049 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

---

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

---

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) 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) 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 2-6.1 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 being needed to process the application.

**B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

---

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

**B.16 Inspection and Entry**

---

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

---

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.19 Credible Evidence [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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

---

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

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

---

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

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

---

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "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 2-6.1-5(a)(2)]**

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

---

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

---

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

### **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

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

---

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

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

---

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

**C.13 Instrument Specifications [326 IAC 2-1.1-11]**

---

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

**Corrective Actions and Response Steps**

**C.14 Response to Excursions or Exceedances**

---

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

- (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

---

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.16 Malfunctions Report [326 IAC 1-6-2]**

---

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

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

**C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]**

---

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;

(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 2-7-5(1)]

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

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the paint spray coating and caulking operation at Plant 1 shall be the following work practices and limitation:

- (a) All architectural paint coatings will be applied with brushes, rollers or air assisted airless spray guns, or equivalent spray applicators at least as efficient.
- (b) Any storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) Coatings shall be used that contain the lowest levels of VOCs possible, while still meeting customer quality, performance and price objectives. Exempt solvents such as water and acetone shall be used to the greatest degree practicable.
- (d) The VOC usage for the paint spray coating and caulking operation at Plant 1 shall be limited to 60 tons per twelve (12) consecutive month period.

#### D.1.2 Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating),

- (1) Operate the coating operation inside the building.
- (2) Spray coat only the interior of the homes being manufactured.
- (3) If accumulations of spray are observed on fans, stacks or on the ground outside the modular unit; then overspray controls must be installed.
- (4) Proper work practices as follows: Maintain and operate the airless air assisted spray guns according to the manufacturer's recommendations.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) paint spray coating operation at Plant 1.

## Compliance Determination Requirements

### D.1.4 Volatile Organic Compounds (VOC)

---

Compliance with the VOC content and usage limitations contained in Condition D.1.1(d) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### D.1.5 VOC Emissions

---

Compliance with Condition D.1.1 (d) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.6 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.1(c) and D.1.1 (d), 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/or the VOC emission limits established in Conditions D.1.1(c) and D.1.1 (d).
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.1.7 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition D.1.1 (d) 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 the "authorized individual" as defined by 326 IAC 2-1.1-1.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) One (1) woodworking operation at Plant 1, processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the Plant 1 woodworking operation shall not exceed 11.8 pounds per hour when operating at a process weight rate of 9,700 pounds per hour.

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

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.2.3 Particulate

- (a) In order to comply with D.2.1, the baghouse for PM control shall be in operation and control emissions from the Plant 1 woodworking operation at all times that the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Plant 1 woodworking operation baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Plant 1 woodworking operation, at least once weekly when the woodworking operation is in operation when venting to the atmosphere. When for any one reading, the pressure drop is outside the following normal ranges of 0.5 inches to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### D.2.6 Broken or Failed Bag Detection

For single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the Plant 1 woodworking operation baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain once per week records of the pressure drop across the baghouse controlling the woodworking process.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activity

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes.

(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 2-7-5(1)]

##### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: All American Homes of Indiana, LLC  
Source Address: Plant 1: 1418 South 13th Street, Decatur, IN, Indiana 46733;  
Mailing Address: 1418 South 13th Street, Decatur, IN 46733  
MSOP No.: M001-21282-00049

**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 Notification
- 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 DATA SECTION**

**MSOP Quarterly Report**

Source Name: All American Homes of Indiana, LLC  
Source Address: Plant 1: 1418 South 13th Street, Decatur, IN, Indiana 46733;  
Mailing Address: 1418 South 13th Street, Decatur, IN 46733  
MSOP No.: M001-21282-00049  
Facility: Surface coating and caulking operation at Plant 1  
Parameter: VOC usage  
Limit: VOC usage not to exceed 60 tons per twelve (12) consecutive month period

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

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 BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	All American Homes of Indiana LLC
<b>Address:</b>	1418 South 13th Street
<b>City:</b>	Decatur, Indiana 46733
<b>Phone #:</b>	260-724-9171
<b>MSOP #:</b>	M001-21282-00049

I hereby certify that All American Homes of Indiana LLC is  still in operation.  
 no longer in operation.  
I hereby certify that All American Homes of Indiana LLC is  in compliance with the requirements of MSOP M001-21282-00049.  
 not in compliance with the requirements of MSOP M001-21282-00049.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

---

---

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

Addendum to the  
Technical Support Document for a Minor Source Operating Permit Renewal

**All American Homes of Indiana, LLC  
1418 South 13<sup>th</sup> Street, Decatur, Indiana 46733**

**M-001-21282, Plt ID-001-00049**

On March 30, 2007, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that All American Homes of Indiana LLC had applied for a Minor Source Operating Permit (MSOP) to operate a modular home manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

Upon further review, the OAQ has made the following revisions to the permit (bolded language has been added and the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

**Change 1:** Mail codes have been added to the addresses in conditions B.9, B.13, B.14, B.17, C.8, C.9 and C.18 as follows:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, IN 46204-2251

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-52 IGCN 1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana 46204-2251

**Change 2:** The SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION form has been removed because there are no natural gas-fired boilers at the source.

**Change 3:** A MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION form has been added to the permit.

**Change 4:** IDEM OAQ has added language to recordkeeping requirements stating that when records are not taken as required a reason why the record was not taken shall be maintained. In order to attempt to clarify the requirements, IDEM has made a change to the record keeping requirements as follows:

D.2.7 Record Keeping Requirements

---

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the Plant 1 woodworking operation baghouse stack exhaust. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).**
  
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain once per week records- **of the pressure drop across the baghouse controlling the woodworking process.**

# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

<b>Source Name:</b>	<b>All American Homes of Indiana, LLC</b>
<b>Source Locations:</b>	<b>1418 South 13<sup>th</sup> Street, Decatur, Indiana 46733</b>
<b>County:</b>	<b>Adams</b>
<b>SIC Code:</b>	<b>2452</b>
<b>Operation Permit No.:</b>	<b>M001-21282-00049</b>
<b>Permit Reviewer:</b>	<b>Teresa Freeman</b>

The Office of Air Quality (OAQ) has reviewed a permit application from All American Homes of Indiana LLC relating to the operation of a modular home manufacturing operation.

### Source History

On February 22, 2007, All American Homes of Indiana LLC submitted an application for a modification of their Part 70 Permit. The source was informing IDEM OAQ of the closure of Plant 2 and removal of all equipment and conditions related to it from their Part 70 Permit. After removal of the Plant 2 surface coating facility, the source has a PTE below 100 tons per year for all criteria pollutants, is a minor source of HAPs and now qualifies for a Minor Source Operating Permit.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted facilities/units:

- (a) One (1) paint spray coating operation at Plant 1, constructed in 1989, using an air assisted airless spray gun application system, coating a maximum of 0.67 modular home drywall components per hour, exhausting inside the plant;
- (b) One (1) caulking operation at Plant 1, constructed in 1989, using caulk guns to apply adhesives and sealants to a maximum of 0.67 modular home components per hour, exhausting inside the plant;
- (c) One (1) woodworking operation at Plant 1, constructed in 1970 processing a maximum of 9,700 pounds of wood per hour, with one (1) baghouse for particulate matter control;
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
  - (1) Fifty-eight (58) natural gas-fired heaters, each having a maximum heat input rating of 0.10 MMBtu per hour;
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per

month.

- (g) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This is a small parts washer at each plant used for maintenance purposes.
- (j) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Paved and unpaved roads and parking lots with public access.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

Since the issuance of the Part 70 Operating Permit T001-11466-00049 on March 12, 2001, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 001-20672-00049 issued on September 22, 2005; and
- (b) Administrative Amendment No. 001-17186-00049 issued on May 7, 2003.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

### **Enforcement Issue**

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that a Minor Source Operating Permit 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 Part 70 permit renewal application for the purposes of this review was received on June 8, 2005. An application requesting the removal of Plant 2 was received on February 22, 2007 and changing the operation level to a Minor Source Operating Permit.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages).

## County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Adams County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
Since this type of operation is not one of the 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 emissions are not counted toward determination of PSD applicability.

## Unrestricted Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution

control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	47.1
PM-10	47.3
SO <sub>2</sub>	0.02
VOC	59.7
CO	2.13
NO <sub>x</sub>	2.54

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
MDI	0.0000016
Hexane	0.05
TOTAL	0.05

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated pollutants are less than one hundred (100) tons per year and the potential to emit of PM/PM10 are greater than twenty-five (25) tons per year. The potential to emit of hazardous air pollutants (HAPs) is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the year 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.8
PM10	4.5
PM2.5	3.7
SO <sub>2</sub>	NA
VOC	11.7
CO	NA
NO <sub>x</sub>	NA
HAP	NA

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating - Plant 1	20.71	20.71	0.0	59.52	0.0	0.0	0.0
Woodworking - Plant 1	5.26	5.26	0.0	0.0	0.0	0.0	0.0
Natural gas combustion from Insignificant Activities	0.05	0.19	0.02	0.14	2.13	2.54	0.05
<b>Total Emissions</b>	<b>26.0</b>	<b>26.2</b>	<b>0.02</b>	<b>59.7</b>	<b>2.13</b>	<b>2.54</b>	<b>0.05</b>

Note: PM10 is assumed to be equivalent to PM for the surface coating and woodworking operations.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, emissions specified in this permit MSOP-001-21282-00049, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) There are no National Emissions Standards for Hazardous Air Pollutants (326 IAC 14, 40 CFR Part 61, 326 IAC 20, and 40 CFR Part 63) included in this permit for this source.
- (c) The requirements of 40 CFR 64 (Compliance Assurance Monitoring) do not apply to this source because this source does not use a control device, as defined in 40 CFR 64.1, to comply with an emission limitation or standard.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Adams County and the potential to emit each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

### State Rule Applicability - Individual Facilities

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

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies )  
Pursuant to 326 IAC 6-3-2(d) Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating),

- (1) Operate the coating operation inside the building.
- (2) Spray coat only the interior of the homes being manufactured.
- (3) If accumulations of spray are observed on fans, stacks or on the ground outside the modular unit; then overspray controls must be installed.
- (4) Proper work practices as follows: Maintain and operate the airless air assisted spray guns according to the manufacturer's recommendations.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation at Plant 1 shall be limited to 11.8 pounds per hour based on a process weight rate of 9700 pounds per hour. The pounds per hour limitation were calculated using the following equation:

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:

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

The baghouse controlling emissions from the woodworking operation shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

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

##### Plant 1

The paint spray coating and caulking operation at Plant 1 is subject to the requirements of this rule because the facility was constructed after January 1, 1980 and potential VOC emissions are greater than 25 tons per year. On February 3, 2000 the source submitted a Best Available Control Technology (BACT) analysis for controlling VOC emissions from the paint spray coating and caulking operation at Plant 1. The analysis followed the "top-down" process described in the USEPA's Office of Air Quality Planning and Standards (OAQPS) guidance documents and is based on potential VOC emissions of 60 tons per year from the paint spray coating and caulking operation at Plant 1.

BACT for the surface coating and caulking operation at Plant 1 was determined to be the following work practices and limitation:

- (a) All architectural paint coatings will be applied with brushes, rollers or air assisted airless

spray guns, or equivalent spray applicators at least as efficient.

- (b) Any storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) Coatings shall be used that contain the lowest levels of VOCs possible, while still meeting customer quality, performance and price objectives. Exempt solvents such as water and acetone shall be used to the greatest degree practicable.
- (d) The VOC usage for the paint spray coating and caulking operation at Plant 1 shall be limited to 60 tons per twelve (12) consecutive month period.

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

This source is not subject to the requirements of this rule because the modular home manufacturing operations do not fall under the applicable industrial categories specified under 326 IAC 8-2-9(a).

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

Sections 2 through 4 of this rule apply to facilities existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph counties or new facilities constructed after January 1, 1980 located anywhere in the state. Sections 5 through 7 of this rule apply to facilities existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph counties or new facilities constructed after July 1, 1990 located anywhere in the state. The degreasing operation at Plant 1, which is also a small parts washer used for maintenance purposes, is subject to 326 IAC 8-3-2 (Cold Cleaner Operation) because it was constructed after January 1, 1980 and prior to July 1, 1990. Pursuant to this rule, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to existing sources (as of January 1, 1980) located in Lake and Marion counties, with potential VOC emissions of 100 tons per year or greater. It also applies to sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions of 100 tons per year or greater. This source, located in Adams County, commenced operation in 1970, therefore, it is not subject to the requirements of this rule.

### Testing Requirements

Testing is not required because the margin of compliance with rule 326 IAC 6-3-2 is large.

### Compliance Requirements

Permits issued under 326 IAC 2-7 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, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. 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 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 operation at Plant 1 has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the Plant 1 woodworking operation baghouse stack shall be performed during normal daylight operations.
- (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Plant 1 woodworking operation, at least once weekly when the woodworking operation is in operation when venting to the atmosphere.

These monitoring conditions are necessary because the baghouse for the Plant 1 woodworking operation must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

## **Conclusion**

The operation of this modular home manufacturing operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit No. M001-21282-00049.

**Appendix A: Emission Calculations Summary**

**Company Name:** All American Homes of Indiana, LLC  
**Address City IN Zip:** 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1  
**Operation Permit No.:** M001-21282-00049  
**Reviewer:** Teresa Freeman  
**Date:** December 7, 2006

<b>Uncontrolled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Surface Coating Plant 1	Woodworking Plant 1	Natural Gas Combustion (Insignificant Activities)	TOTAL
PM	20.71	26.28	0.05	47.1
PM10	20.71	26.28	0.19	47.3
SO2	0.00	0.00	0.02	0.02
NOx	0.00	0.00	2.54	2.54
VOC	59.52	0.00	0.14	59.7
CO	0.00	0.00	2.13	2.13
total HAPs	0.00	0.00	0.05	0.05
worst case single HAP	0.00	0.00	0.05	0.05
<b>Controlled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Surface Coating Plant 1	Woodworking Plant 1	Natural Gas Combustion (Insignificant Activities)	TOTAL
PM	20.71	5.26	0.05	26.0
PM10	20.71	5.26	0.19	26.2
SO2	0.00	0.00	0.02	0.02
NOx	0.00	0.00	2.54	2.54
VOC	59.52	0.00	0.14	59.7
CO	0.00	0.00	2.13	2.13
total HAPs	0.00	0.00	0.05	0.05
worst case single HAP	0.00	0.00	0.05	0.05
Total emissions based on rated capacity at 8,760 hours/year.				

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations-Plant 1**

**Company Name: All American Homes of Indiana, LLC  
Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1  
Operation Permit No.: M001-21282-00049  
Reviewer: Teresa Freeman  
Date: December 7, 2006**

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
<b>Paint Spray Guns</b>																
Paints	11.04	53.00%	42.7%	10.3%	56.5%	30.00%	13.6000	0.670	2.62	1.14	10.39	249.40	45.52	20.71	3.80	90%
<b>Caulk Guns</b>																
Sealants	8.51	30.00%	0.0%	30.0%	0.0%	60.00%	0.4700	0.670	2.55	2.55	0.80	19.29	3.52	0.00	4.26	100%
Adhesives	10.51	9.71%	0.0%	9.7%	0.0%	83.00%	3.5000	0.670	1.02	1.02	2.39	57.43	10.48	0.00	1.23	100%
											<b>13.59</b>	<b>326.13</b>	<b>59.52</b>	<b>20.71</b>		

**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)  
Transfer Efficiency of paint spray guns was obtained from guidelines provided by ICI Paints (Glidden), a major supplier of architectural coatings, when estimating coverage and usage for their coatings.  
Total = Worst Coating + Sum of all solvents used  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**

**HAP Emission Calculations-**

**Surface Coating-Plant 1**

**Company Name: All American Homes of Indiana, LLC**

**Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1**

**Operation Permit No.: M001-21282-00049**

**Reviewer: Teresa Freeman**

**Date: December 7, 2006**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MDI	MDI Emissions* (ton/yr)
<b>Paint Spray Guns</b>					
Paints	11.04	13.6000	0.670	0.00%	0.00
<b>Caulk Guns</b>					
Sealants	8.51	0.4700	0.670	0.00%	0.00
Adhesives	10.51	3.5000	0.670	9.80%	1.62E-06
Total State Potential Emissions					<b>0.00</b>

**METHODOLOGY**

**Total HAPs: 0.00**

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

\* Note: Based on emission factors established by the Polyurethane Division of the Society of the Plastics Industry, for applications of such materials, whether open or enclosed, less than 0.015 lbs of MDI is emitted for every million lbs of adhesives or sealants used.

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

**Company Name: All American Homes of Indiana, LLC  
 Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1  
 Operation Permit No.: M001-21282-00049  
 Reviewer: Teresa Freeman  
 Date: December 7, 2006**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.80	50.8

Heat Input Capacity includes 58 heaters, each rated at 0.1 MMBtu/hr at Plant 1 .

	Pollutant					
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.05	0.19	0.02	2.54	0.14	2.13

\*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

**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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**HAPs Emissions**

**Company Name: All American Homes of Indiana, LLC**  
**Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733 - Plant 1**  
**Operation Permit No.: M001-21282-00049**  
**Reviewer: Teresa Freeman**  
**Date: December 7, 2006**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.335E-05	3.048E-05	1.905E-03	4.573E-02	8.637E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	<b>Total (ton/yr)</b>
Potential Emission in tons/yr	1.270E-05	2.794E-05	3.557E-05	9.654E-06	5.335E-05	<b>4.8E-02</b>

Methodology is the same as page 6.

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

**Appendix A: Emission Calculations  
Baghouse Operations**

**Company Name: All American Homes of Indiana, LLC**  
**Address City IN Zip: 1418 South 13th Street, Decatur, Indiana 46733-Plant 1**  
**Operation Permit No. T001-21282-00049**  
**Reviewer: Teresa Freeman**  
**Date: February 8, 2007**

**Woodworking Operations-Plant 1**

Control Efficiency						
95.00%						
Pollutant	Inlet Grain Loading per Actual Cubic foot of Outlet Air (grains/acfm)	Flow Rate (acfm)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
PM	0.1	7000	6.000	26.28	1.20	5.26
PM10	0.1	7000	6.000	26.28	1.20	5.26

**Methodology**  
Emission Rate in lbs/hr (after controls) = (grains/acfm) (acfm) (60 min/hr) (lb/7000 grains)  
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)  
Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)  
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
9700	4.850	11.81

**Methodology**

Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>