INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 6, 2006

RE: Dutchmen Manufacturing, Inc. / 087-21758-00062

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) AND NEW SOURCE REVIEW OFFICE OF AIR QUALITY

Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line 0965 N. 1150 W. Middlebury, Indiana 46540

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F087-21758-00062	
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: January 6, 2006 Expiration Date: January 6, 2011

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

D.3.1 Particulate [326 IAC 6-3-2]

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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary transportation trailer manufacturing facility.

Authorized individual:	President
Source Address:	0965 N. 1150 W, Middlebury, Indiana 46540
Mailing Address:	2164 Caragana Court, Goshen, Indiana 46526
General Source Phone:	(574) 534-1224
SIC Code:	3792
Source Location Status:	LaGrange Attainment for other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) woodworking operation in the chassis and floor preparation area, to be constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

(b) One (1) woodworking operation in the cabinet and mill area, to be constructed in 2005, with a maximum throughput rate of 1318 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

(c) One (1) unit assembly area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by hand wiping and brushing, applying coatings to wood, plastic, metal, and foam substrates, and exhausting to general ventilation.

(d) One (1) final finish and repair area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood, plastic, metal, and glass substrates, and exhausting to general ventilation.

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

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

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and/or woodworking operations.

(b) One (1) woodworking operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by a portable baghouse identified as PB1, and exhausting to stack F4.

(c) One (1) PVC pipe cutting operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 10 pounds of PVC pipe per hour, controlled by a portable baghouse identified as PB2, and exhausting to stack F4.

(d) One (1) chassis frame and floor preparation area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol cans and hand wiping, applying coatings to metal, wood, and plastic substrate, with emissions exhausting to general ventilation.

(e) One (1) cabinet and mill area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood substrates, and exhausting to general ventilation.

(f) One (1) slide out assembly area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to metal and wood substrate, and exhausting to general ventilation.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 PMP does not require the certification by the "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.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northern Regional Office
Telephone No.: 1-800-753-5519 or 219-245-4820
Facsimile No.: 219-245-4877

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of

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

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

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

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

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in *Sections A.2 and A.3*.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on

pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

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

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

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

within 180 days from the date on which this source commences operation).

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) woodworking operation in the chassis and floor preparation area, to be constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

(b) One (1) woodworking operation in the cabinet and mill area, to be constructed in 2005, with a maximum throughput rate of 1318 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

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

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

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.1.4 PSD Minor Limit for PM [326 IAC 2-2]

The combined PM emissions from the woodworking operations in the chassis and floor area and the cabinet and mill area shall be limited to 55.9 pounds per hour. This condition limits the potential to emit PM from the entire source to less than 250 tons per year and makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this source.

D.1.5 FESOP and PSD Minor Limit for PM_{10} [326 IAC 2-2] [326 IAC 2-8]

The combined PM_{10} emissions from the woodworking operations in the chassis and floor area and the cabinet and mill area shall be limited to 4.28 pounds per hour. This condition limits the potential to emit PM_{10} from the entire source to less than 100 tons per year and makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Past 70 Permit Program) not applicable to this source.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations shall be limited to the following pound per hour limits:

Facility	Process Weight (lbs/hour)	Particulate Emission Rate (lbs/hour)
Chassis and Floor Area	312	1.18
Cabinet and Mill Area	1,318	3.10

The pounds per hour limitations were calculated using the following equation:

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

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

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

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

Compliance Determination Requirements

D.1.8 Particulate Control

(a) In order to comply with Conditions D.1.4, D.1.5, and D.1.6, the baghouse for particulate control identified as DC shall be in operation and control emissions from the woodworking operations in the chassis and floor preparation area and cabinet and mill area at all times that the woodworking operations are in operation.

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

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

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.1.4 and D.1.5, the Permittee shall perform PM and PM-10 testing for the woodworking operations in the chassis and floor preparation area and the cabinet and mill area utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.1.10 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking operations in the chassis and floor area and the cabinet and mill area 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.1.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the baghouse DC stack exhaust.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11 and the dates the vents are redirected.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(c) One (1) woodworking operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by a portable baghouse identified as PB1, and exhausting to stack F4.

(d) One (1) PVC pipe cutting operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 10 pounds of PVC pipe per hour, controlled by a portable baghouse identified as PB2, and exhausting to stack F4.

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

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

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

Pursuant to 326 IAC 6-3-2(a)(3), the particulate emissions from the PVC pipe cutting and insignificant woodworking operations shall not exceed 0.551 pounds per hour for process weights less than 100 pounds per hour.

Compliance Determination Requirements

D.2.2 Particulate Control

(a) In order to comply with Condition D.2.1, the baghouses used for particulate control (identified as PB1 and PB2) shall be in operation and control emissions from the pipe cutting and woodworking operations in the unit assembly area at all times that these facilities are in operation.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and/or woodworking operations.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant machining and grinding shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line
Source Address: 0965 N. 1150 W, Middlebury, Indiana 46540
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: 087-21758-00062

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line
Source Address: 0965 N. 1150 W, Middlebury, Indiana 46540
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: 087-21758-00062

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

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

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

Source Name: Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line
Source Address: 0965 N. 1150 W, Middlebury, Indiana 46540
Mailing Address: 2164 Caragana Court, Goshen, Indiana 46526
FESOP No.: 087-21758-00062

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed By: ____________________________________

Title/Position: ____________________________________

Date: ____________________________________

Phone: ____________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)
and New Source Review

Source Background and Description

Source Name:	Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line
Source Location:	0965 N. 1150 W, Middlebury, Indiana 46540
County:	Lagrange
SIC Code:	3792
Operation Permit No.:	F087-21758-00062
Permit Reviewer:	ERG/HJ

The Office of Air Quality (OAQ) has reviewed a FESOP application from Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line relating to the operation of a stationary transportation trailer manufacturing facility.

Source Definition

There is another facility owned by Dutchmen Manufacturing, Inc. also located in Middlebury, Indiana. The existing Dutchmen Manufacturing, Inc facility is currently registered under Registration number #039-5570-00377 and located at 69871 East County Line Road. The two sources will have the same owner and both will operate under SIC 3792. However, the existing Dutchmen facility produces recreational vehicles and the new facility will produce travel trailers. Although both facilities will share the same senior level managers, completely different staff will work at the two facilities. The facilities will be located five miles apart. The two facilities will not share materials nor will the output of one source be used by the other source. Thus, IDEM has determined that these two sources are not collocated.

New Emission Units and Pollution Control Equipment

The source plans to construct the following emissions units:

(a) One (1) woodworking operation in the chassis and floor preparation area, to be constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

(b) One (1) woodworking operation in the cabinet and mill area, to be constructed in 2005, with a maximum throughput rate of 1318 pounds of wood per hour, controlled by a baghouse identified as DC, and exhausting to stack P1.

(c) One (1) unit assembly area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by hand wiping and brushing, applying coatings to wood, plastic, metal, and foam substrates, and exhausting to general ventilation.

(d) One (1) final finish and repair area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and

hand wiping, applying coatings to wood, plastic, metal, and glass substrates, and exhausting to general ventilation.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and/or woodworking operations. [326 IAC 6-3]

(b) One (1) woodworking operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by a portable baghouse identified as PB1, and exhausting to stack F4. [326 IAC 6-3]

(c) One (1) PVC pipe cutting operation in the unit assembly area, to be constructed in 2005, with a maximum throughput rate of 10 pounds of PVC pipe per hour, controlled by a portable baghouse identified as PB2, and exhausting to stack F4. [326 IAC 6-3]

(d) One (1) chassis frame and floor preparation area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol cans and hand wiping, applying coatings to metal, wood, and plastic substrate, with emissions exhausting to general ventilation.

(e) One (1) cabinet and mill area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood substrates, and exhausting to general ventilation.

(f) One (1) slide out assembly area, to be constructed in 2005, with a maximum throughput rate of 2.5 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to metal and wood substrate, and exhausting to general ventilation.

(g) Natural gas fired units, consisting of the following: three (3) thermocycler air rotation units, each with a maximum heat input capacity of 1.80 MMBtu/hr.

(h) One (1) stick welding station, with a maximum capacity of 0.120 pounds per hour.

(i) The following VOC and HAP storage containers: one (1) two hundred and fifty (250 gallon) storage tank with annual throughputs equal to or less than twelve thousand (12,000) gallons.

Existing Approvals

The source has no existing approvals.

Enforcement Issues

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on September 12, 2005.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	$1.64x10^3$
PM-10	$1.64x10^3$
SO_2	0.005
VOC	23.5
CO	1.99
NOx	2.37

HAPs	Potential To Emit (tons/year)
Toluene	0.36
Hexane	0.29
MEK	2.07
TOTAL	2.25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source applied for a FESOP. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Surface Coating	0.08	0.08	0.00	23.4	0.00	0.00	2.20
PVC Pipe Cutting	2.02	2.02	0.00	0.00	0.00	0.00	0.00
Woodworking	247	20.8	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.18	0.18	0.005	0.13	1.99	2.37	0.04
Welding	0.01	0.01	0.00	0.00	0.00	0.00	0.0005
Total Emissions	249.3	23.1	0.005	23.5	1.99	2.37	2.25

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) LaGrange County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD and Emission Offset Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	249.2
PM-10	23.0
SO_2	0.005
VOC	23.8
CO	0.66
NO_x	0.79
Single HAP	2.07
Combination HAPs	2.22

(a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) The source does not perform surface coating operations of metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in this permit.

(c) This source does not apply surface coatings to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not included in this permit.

(d) The storage tank at this source has a capacity less than 75 cubic meters (19,813 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb) are not included in this permit.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.

(f) This new source is not a major source of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) are not included in this permit.

(g) This new source is not a major source of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing and Surface Coatings (40 CFR 63, Subpart JJ) are not included in this permit.

State Rule Applicability - Entire Source

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

This source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit of SO_2, NOx, VOC, and CO is less than 250 tons/year. The unrestricted PM/PM10 PTE is greater than 250 tons/year. The following conditions were included in this FESOP to limit the PM/PM10 to PSD minor levels.

(a) The combined PM emissions from the woodworking operations in the chassis and floor area and the cabinet and mill area shall be limited to 55.9 pounds per hour. This condition limits the potential to emit PM from the entire source to less than 250 tons per year and makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this source.

(b) The combined PM_{10} emissions from the woodworking operations in the chassis and floor area and the cabinet and mill area shall be limited to 4.28 pounds per hour. This condition limits the potential to emit PM_{10} from the entire source to less than 100 tons per year and makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70 Permit Program) not applicable to this source.

The source will comply with these emission rate limitations using baghouse DC, which will be used to control emissions from both the chassis and floor area and the cabinet and mill area. Baghouse DC exhausts through a single stack identified as stack P1.

The PM/PM10 potential to emit of the surface coating, PVC pipe cutting, natural gas combustion, insignificant woodworking and welding is very small. Thus, these units do not require an individual limit.

326 IAC 2-6 (Emission Reporting)

This source is located in LaGrange County and the source is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP Limitations)

The potential to emit PM_{10} is greater than 100 tons per year. The potential to emit all other criteria pollutants is less than 100 ton per year. This source has voluntarily agreed to limit the PM10 emissions to less than 100 tons per year. The majority of the PM10 emissions (1,633 tons per year) are from the woodworking operations in the chassis and floor area and the cabinet and mill area. The following limitation has been included in the draft permit:

The PM_{10} emissions from the woodworking operations in the chassis and floor area and the cabinet and mill area shall be limited to 4.28 pounds per hour. This condition limits the PM_{10} emissions from the entire source to less than 100 tons per year and makes the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

The source will comply with this limitation using baghouse DC, which will control particulate emissions from both the chassis and floor area and the cabinet and mill area. Baghouse DC exhausts through a single stack identified as stack P1.

The PM10 potential to emit of the surface coating, PVC pipe cutting, natural gas combustion, insignificant woodworking and welding is very small. Thus, these units do not require an individual limit.

326 IAC 5-1 (Opacity Limitations)

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

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

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

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

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

State Rule Applicability – Chassis and Floor Area and Cabinet and Mill Area Woodworking Operations

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

The allowable particulate emissions from the woodworking operations shall be limited to the following pound per hour limits:

Facility	Process Weight (lbs/hour)	Particulate Emission Rate (lbs/hour)
Chassis and Floor Area	312	1.18
Cabinet and Mill Area	1,318	3.10

The pounds per hour limitations were calculated using the following equation:

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

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

As shown in Appendix A, the potential to emit particulate from this woodworking operation after control is less than the emission limit above. The use of the baghouse ensures compliance with this limit.

State Rule Applicability – PVC Pipe Cutting and Insignificant Woodworking Operations in the Assembly Area

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

Pursuant to 326 IAC 6-3-2(a)(2), the particulate emissions from the PVC pipe cutting and insignificant woodworking operations shall not exceed 0.551 pound per hour for process weights less than 100 pounds per hour.

As shown in Appendix A, the potential to emit particulate after controls for the PVC pipe cutting operation and insignificant woodworking is less than the emission limit above. Therefore, use of the baghouse ensures compliance with this limit.

State Rule Applicability - Coating Operations

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

Metal parts will be coated in the chassis and frame area, slide-out assembly area, unit assembly area, and final finish and repair area. Although these facilities will be constructed after July 1, 1990, they are not subject to the requirements of 326 IAC 8-2-9 because they each have potential VOC emissions that are less than 15 pounds per day. Any change that would increase the actual VOC emissions from any of these facilities to greater than 15 pounds per day requires prior approval from IDEM, OAQ.

The cabinet and mill area will not be used to coat metal parts and therefore is not subject to the requirements of 326 IAC 8-2-9.

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

Although the cabinet and mill area will be used to apply coatings to wood cabinets and will be constructed after July 1, 1990, the potential to emit VOC will be less than the 15 pounds per day applicability threshold for 326 IAC 8-2-12. Therefore, the requirements of 326 IAC 8-2-12 are not applicable to this facility. Any change that would increase the actual VOC emissions to greater than 15 pounds per day requires prior approval from IDEM, OAQ.

The chassis frame and floor area, slide-out assembly area, unit assembly area, and final finish and repair area are not subject to the requirements of 326 IAC 8-2-12 because they will not be used to apply surface coatings to wood furniture or cabinets.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the surface coating operations in the chassis frame and floor preparation area, unit assembly area, and final finish and repair areas are less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

The metal and wood cabinet coating activities at this source are not subject to the requirements of 326 IAC 8-1-6 because these activities are regulated by other Article 8 rules.

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

Pursuant to 326 IAC 6-3-1(b), surface coating operations using flow coating, brush coating, and aerosol coating products are exempt from the requirements of 326 IAC 6-3. In addition, the spray coating operations in the chassis frame and floor preparation area, slide-out assembly area, cabinet and mill area, and final finish and repair areas do not use more than 5 gallons of coating per day. Therefore, the spray coating operations in the chassis frame and floor preparation area, slide-out assembly area, unit assembly area, cabinet and mill area, and final finish and repair areas are not subject to the requirements of 326 IAC 6-3. Any changes that increase the spray coating operations to greater than five (5) gallons of coating per day requires prior approval from IDEM OAQ.

State Rule Applicability – Insignificant Welding Operations

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

The welding operations at this source consume less than 625 pounds of rod or wire per day. Therefore, the welding equipment at this source is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(9).

State Rule Applicability – Insignificant Grinding and Machining

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant machining and grinding shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

State Rule Applicability – Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to the storage tanks at this source.

326 IAC 12 (NSPS Requirements)

The storage tanks at this source have capacities less than 40 cubic meters (10,567 gallons). Therefore, these solvent storage tanks are not subject to the requirements of New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb as of date July 1, 2002).

Testing Requirements

Testing is required by this FESOP permit because the majority of the PTE of PM/PM10 for the total plant is generated by the woodworking operations in the chassis and floor preparation area and the cabinet and mill area. The testing applicable to the source is as follows:

During the period between 30 and 36 months after issuance of this FESOP, in order to

demonstrate compliance with Condition D.1.4 and D.1.5, the Permittee shall perform PM and PM-10 testing for the woodworking operations in the chassis and floor preparation area and cabinet and mill area utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

This testing is necessary because the baghouse for the woodworking must operate properly to ensure compliance with 326 IAC 2-2, 326 IAC 2-8, and 326 IAC 6-3-2.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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:

(a) Daily visible emission notations of the woodworking operations in the chassis and floor area and the cabinet and mill area 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

(f) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when

venting indoors. All defective bags shall be replaced.

(g) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

This monitoring is necessary because the baghouse must operate properly to demonstrate compliance with 326 IAC 2-2, 326 IAC 2-8, and 326 IAC 6-3-2.

Conclusion

The operation of this transportation trailer manufacturing facility shall be subject to the conditions of the attached FESOP No.: F087-21758-00062.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a
Federally Enforceable State Operating Permit (FESOP)
and New Source Review

Source Background and Description

Source Name:	Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line
Source Location:	0965 N. 1150 W, Middlebury, Indiana 46540
County:	LaGrange
SIC Code:	3792
Operation Permit No.:	F087-21758-00062
Permit Reviewer:	ERG/HJ

On October 7, 2005, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard**,** LaGrange, Indiana, stating that Dutchmen Mfg., Inc. – Middlebury Travel Trailer Line had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of a stationary transportation trailer manufacturing facility with control. 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 decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

1. IDEM's mailing address has been corrected throughout the permit:

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

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, has amended the Section B – Emergency Provisions condition, and had deleted the recordkeeping requirement in Condition D.1.13.

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

. . .

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

(**b**~~c~~) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP**s** do~~es~~ not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(**c**~~d~~) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

…

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

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

. . .

(e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

. . .

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the baghouse DC stack exhaust.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11 and the dates the vents are redirected.

~~(c) To document compliance with Condition D.1.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

3. For clarification purposes, Condition B.18 has been revised as follows:

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

. . .

(3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

…

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

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

….

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

. . .

4. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition. Condition numbers and references to Conditions have been renumbered as necessary.

C.15 ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-8-4] [326 IAC 2-8-5]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

. . .

D.1.10 Visible Emissions Notations

. . .

(e) **If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~ Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

5. Paragraph (a) of ConditionD.1.12 Broken or Failed Baghouse has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Conditions D.1.8, D.1.12, and D.2.2 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

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

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

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

D.1.8 Particulate Control

(a) In order to comply with Conditions D.1.4, D.1.5, and D.1.6, the baghouse for particulate control identified as DC shall be in operation and control emissions from the woodworking operations in the chassis and floor preparation area and cabinet and mill area at all times that the woodworking operations are in operation.

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

D.2.2 Particulate Control

(a) In order to comply with Condition D.2.1, the baghouses used for particulate control (identified as PB1 and PB2) shall be in operation and control emissions from the pipe cutting and woodworking operations in the unit assembly area at all times that these facilities are in operation

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

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 0965 N 1150 W, Middlebury, IN 46540
FESOP Permit : 087-21758-00062
Prepared by: ERG/HJ
Date: September 19, 2005

Material	Substrate	Density (lbs/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 (ton/yr)	Transfer Efficiency
Chassis Frame and Floor Prep													
Spray N Go paint (touch-up)	metal	6.67	78.0%	2.00%	76.0%	0.01	2.50	5.07	0.15	3.65	0.67	0.05	75%
Cyclo silicone	metal, wood, plastic	5.92	92.5%	7.50%	85.0%	0.00	2.50	5.03	0.00	0.09	0.02	0.00	75%
Oatey ABS cement	plastic	7.50	88.0%	0.00%	88.0%	0.01	2.50	6.60	0.17	3.96	0.72	0.02	75%
Enerfoam adhesive	metal, wood, plastic	10.0	0.00%	0.00%	0.00%	0.01	2.50	0.00	0.00	0.00	0.00	0.00	100%
Foam cleaner	metal, wood, plastic	7.99	95.8%	0.00%	95.8%	0.00	2.50	7.65	0.02	0.46	0.08	0.00	75%
Cabinet & Mill									**0.34**	**8.16**	**1.49**	**0.07**	
Mobilbond glue	wood	9.49	60.0%	0.00%	60.0%	0.01	2.50	5.69	0.16	3.76	0.69	0.00	100%
Cyclo silicone	wood	5.92	92.5%	7.50%	85.0%	0.00	2.50	5.03	0.01	0.18	0.03	0.00	75%
Bostik supertak	wood	5.80	71.0%	20.0%	51.0%	0.00	2.50	2.96	0.03	0.71	0.13	0.00	100%
Slide-out Assembly									**0.19**	**4.65**	**0.85**	**0.00**	
Geocel 2300 sealant	wood	7.92	35.0%	0.00%	35.0%	0.03	2.50	2.77	0.22	5.32	0.97	0.00	100%
Cyclo silicone	metal, wood	5.92	92.5%	7.50%	85.0%	0.00	2.50	5.03	0.00	0.09	0.02	0.00	75%
Mobilbond glue	wood	9.49	60.0%	0.00%	60.0%	0.00	2.50	5.69	0.03	0.68	0.12	0.00	100%
Bostik supertak	wood	5.80	71.0%	20.0%	51.0%	0.00	2.50	2.96	0.01	0.35	0.06	0.00	100%
Unit Assembly									**0.27**	**6.45**	**1.18**	**0.00**	
Geocel 2300 sealant	wood	7.92	35.0%	0.00%	35.0%	0.07	2.50	2.77	0.51	12.3	2.25	0.00	100%
Oatey PVC cement	plastic	7.50	88.0%	0.00%	88.0%	0.02	2.50	6.60	0.25	5.94	1.08	0.00	100%
Oatey Cleaner	plastic	6.58	100.0%	20.0%	80.0%	0.00	2.50	5.26	0.03	0.63	0.12	0.00	100%
502 LSW lap sealant	wood, plastic	9.92	30.6%	0.00%	30.6%	0.35	2.50	3.04	2.66	63.7	11.6	0.00	100%
905 BA bonding cement	wood, plastic	8.20	51.0%	50.5%	0.50%	0.25	2.50	0.04	0.03	0.62	0.11	0.00	100%
IPS Weld-on	plastic	7.30	70.0%	0.00%	70.0%	0.01	2.50	5.11	0.13	3.07	0.56	0.00	100%
Mobilbond glue	wood	9.49	60.0%	0.00%	60.0%	0.01	2.50	5.69	0.07	1.71	0.31	0.00	100%
Bostik supertak	wood, foam insulation	5.80	71.0%	20.0%	51.0%	0.00	2.50	2.96	0.03	0.71	0.13	0.00	100%
Cyclo silicone	metal, wood, plastic	5.92	92.5%	7.50%	85.0%	0.00	2.50	5.03	0.01	0.30	0.06	0.00	75%
WD 40	metal, equipment	6.67	78.0%	0.00%	78.0%	0.00	2.50	5.20	0.01	0.25	0.05	0.00	75%
Final Finish and Repair									**3.72**	**89.3**	**16.3**	**0.00**	
Geocel 2300 sealant	wood	7.92	35.0%	0.00%	35.0%	0.03	2.50	2.77	0.19	4.66	0.85	0.00	100%
Geocel 2000 sealant	wood	8.34	33.5%	15.0%	18.5%	0.00	2.50	1.54	0.02	0.37	0.07	0.00	100%
Tite R Bond	wood, plastic	7.42	98.2%	0.00%	98.2%	0.00	2.50	7.29	0.01	0.22	0.04	0.00	75%
Touch N Tone enamel	wood, plastic	5.56	99.0%	20.0%	79.0%	0.03	2.50	4.39	0.27	6.59	1.20	0.00	75%
Cyclo silicone	metal, wood, plastic	5.92	92.5%	7.50%	85.0%	0.00	2.50	5.03	0.00	0.09	0.02	0.00	75%
Brake Cleaner	wood, plastic	6.34	100.0%	26.0%	74.0%	0.00	2.50	4.69	0.05	1.13	0.21	0.00	100%
Glass Cleaner	glass	8.26	99.9%	87.0%	12.9%	0.01	2.50	1.06	0.03	0.64	0.12	0.00	75%
Dupont lacquer thinner	wood, plastic	6.32	100.0%	0.00%	100%	0.01	2.50	6.32	0.08	1.90	0.35	0.00	100%
Mineral spirits	wood, plastic	6.59	100.0%	0.00%	100%	0.01	2.50	6.59	0.16	3.95	0.72	0.00	100%
									0.81	**19.5**	**3.57**	**0.00**	
Total											**23.4**	**0.08**	

NOTES

* Assume all the PM emissions are PM10 emissions.
** The transfer efficiency information is provided by the manufacturer.
No particulate control device is used. Coatings will be applied by brushing, hand wiping, and spray can.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/da
PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lb
PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficienc
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lb

Appendix A:
HAPs
From Surface Coating Operations

Company Name: **Dutchmen Manufacturing, Inc.**
Address City IN Zip: **0965 N 1150 W, Middlebury, IN 46540**
FESOP Permit: **087-21758-00062**
Prepared by: **ERG/HJ**
Date: **September 19, 2005**

Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/hr)	Weight % Toluene	Weight % Hexane	Weight % MEK	Weight % Xylene	Weight % Ethyl Benzene	Weight % Cumene	PTE of Toluene (tons/yr)	PTE of Hexane (tons/yr)	PTE of MEK (tons/yr)	PTE of Xylene (tons/yr)	PTE of Ethyl Benzene (tons/yr)	PTE of Cumene (tons/yr)	Total PTE of HAPs
Chassis Frame and Floor Prep																
Spray N Go paint (touch-up)	6.67	0.01	2.50	5.00%	0.00%	7.50%	7.50%	3.00%	0.00%	0.04	0.00	0.07	0.07	0.03	0.00	0.20
Cyclo silicone	5.92	0.00	2.50	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.01
Oatey ABS cement	7.50	0.01	2.50	0.00%	0.00%	75.00%	0.00%	0.00%	0.00%	0.00	0.00	0.62	0.00	0.00	0.00	0.62
Enerfoam adhesive	10.01	0.01	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Foam cleaner	7.99	0.00	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cabinet & Mill								0.00%								0.82
Mobilbond glue	9.49	0.01	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo silicone	5.92	0.00	2.50	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.01
Bostik supertak	5.80	0.00	2.50	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.08	0.00	0.00	0.00	0.00	0.08
Slide-out Assembly								5.00%								0.09
Geocel 2300 sealant	7.92	0.03	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo silicone	5.92	0.00	2.50	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.01
Mobilbond glue	9.49	0.00	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bostik supertak	5.80	0.00	2.50	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.04
Unit Assembly																0.04
Geocel 2300 sealant	7.92	0.07	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey PVC cement	7.50	0.02	2.50	0.00%	0.00%	55.00%	0.00%	0.00%	0.00%	0.00	0.00	0.68	0.00	0.00	0.00	0.68
Oatey Cleaner	6.58	0.00	2.50	0.00%	0.00%	80.00%	0.00%	0.00%	0.00%	0.00	0.00	0.12	0.00	0.00	0.00	0.12
502 LSW lap sealant	9.92	0.35	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
905 BA bonding cement	8.20	0.25	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
IPS Weld-on	7.30	0.01	2.50	0.00%	0.00%	75.00%	0.00%	0.00%	0.00%	0.00	0.00	0.60	0.00	0.00	0.00	0.60
Mobilbond glue	9.49	0.01	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bostik supertak	5.80	0.00	2.50	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.08	0.00	0.00	0.00	0.00	0.08
Cyclo silicone	5.92	0.00	2.50	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.02	0.00	0.00	0.00	0.00	0.02
WD 40	6.67	0.00	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Final Finish and Repair																1.49
Geocel 2300 sealant	7.92	0.03	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Geocel 2000 sealant	8.34	0.00	2.50	0.00%	0.00%	0.00%	7.00%	0.00%	3.00%	0.00	0.00	0.00	0.03	0.00	0.01	0.04
Tite R Bond	7.42	0.00	2.50	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Touch N Tone enamel	5.56	0.03	2.50	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23	0.00	0.00	0.00	0.00	0.00	0.23
Cyclo silicone	5.92	0.00	2.50	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.01
Brake Cleaner	6.34	0.00	2.50	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08	0.00	0.00	0.00	0.00	0.00	0.08
Glass Cleaner	8.26	0.01	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dupont lacquer thinner	6.32	0.01	2.50	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00	0.01
Mineral spirits	6.59	0.01	2.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total										**0.36**	**0.25**	**2.07**	**0.09**	**0.03**	**0.01**	**2.20**

METHODOLOGY

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

Appendix A: Emission Calculations
PM/PM10 Emissions
From the PVC Pipe Cutting Operation

Company Name: **Dutchmen Manufacturing, Inc.**
Address : **0965 N 1150 W, Middlebury, IN 46540**
Permit: **087-21758-00062**
Reviewer: **ERG/HJ**
Date: **September 19, 2005**

Process Description:

PM Control Equipment:	Baghouse	
Grain Loading:	0.00048	grains/dscf
Air Flow Rate:	1,120	acfm
Control Efficiency:	99.0%	

1. Potential to Emit After Control:

Assume all the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions	= 0.00048 (gr/dscf) x 1120 (cf/min) x 60 (min/hr) x 1/7000 (lb/gr)=	**0.005 lbs/hr**
Annual PM/PM10 emissions	= 0.005 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	**0.02 tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control	= 0.02 tons/yr / (1-99.0% Control Efficiency) =	**2.02 tons/yr**

Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking in Unit Assembly

Company Name: **Dutchmen Manufacturing, Inc.**
Address : **0965 N 1150 W, Middlebury, IN 46540**
FESOP Permit: **087-21758-00062**
Reviewer: **ERG/HJ**
Date: **September 19, 2005**

Process Description:

PM Control Equipment: Baghouse
Grain Loading: 0.00048 grains/dscf
Air Flow Rate: 1,120 acfm
Control Efficiency: 99.0%

1. Potential to Emit After Control:

Assume all the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions	= 0.00048 (gr/dscf) x 1120 (cf/min) x 60 (min/hr) x 1/7000 (lb/gr)=	**0.005**	**lbs/hr**
Annual PM/PM10 emissions	= 0.005 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	**0.02**	**tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control	= 0.02 tons/yr / (1-99.0% Control Efficiency) =	**2.02**	**tons/yr**

Appendix A: Emission Calculations
PM/PM10 Emissions
From the Woodworking Operations in the Chassis and Floor and Cabinet and Mill Areas

Company Name: Dutchmen Manufacturing, Inc.
Address : 0965 N 1150 W, Middlebury, IN 46540
Permit: 087-21758-00062
Reviewer: ERG/HJ
Date: September 19, 2005

Process Description:

PM Control Equipment: Baghouse
Grain Loading: 0.00087 grains/dscf
Air Flow Rate: 10,000 acfm
Control Efficiency: 99.98%

1. Potential to Emit After Control:

Assume all the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions	= 0.00087 (gr/dscf) x 10,000 (cf/min) x 60 (min/hr) x 1/7000 (lb/gr) =	**0.07 lbs/hr**
Annual PM/PM10 emissions	= 0.07 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	**0.33 tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control	= 0.33 tons/yr / (1-99.98% Control Efficiency) =	**1,633 tons/yr**

Appendix A: Emission Calculations
Natural Gas Consumption
(MMBtu/hr <100)
From Natural Gas Combustion Units

Company Name: **Dutchmen Manufacturing, Inc.**
Address: **0965 N 1150 W, Middlebury, IN 46540**
FESOP Permit : **087-21758-00062**
Prepared by: **ERG/HJ**
Date: **September 19, 2005**

Three thermocyclers each rated at 1.80 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.40	47.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.60	7.60	0.60	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.18	0.18	0.01	2.37	0.13	1.99

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factor for NOx: Uncontrolled = 100 lb/MMCF

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	**4.97E-05**	**2.84E-05**	**1.77E-03**	**0.04**	**8.04E-05**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	**1.18E-05**	**2.60E-05**	**3.31E-05**	**8.99E-06**	**4.97E-05**	**0.04**

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

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

Appendix A: Emission Calculations
PM and HAP Emissions
From Welding Operations

Company Name: **Dutchmen Manufacturing, Inc.**
Address: **0965 N 1550 W, Middlebury, IN 46540**
FESOP Permit: **087-21758-00062**
Prepared by: **ERG/HJ**
Date: **September 19, 2005**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
WELDING			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Stick (E7014 electrode)	1	0.12	0.0211	0.0009			2.53E-03	0.00	0.00	0.00	0.00
EMISSION TOTALS											
Potential Emissions lbs/hr							2.53E-03	0.00	0.00	0.00	0.00
Potential Emissions lbs/day							0.06	2.59E-03	0.00	0.00	2.59E-03
Potential Emissions tons/year							**0.01**	**0.00**	**0.00**	**0.00**	4.73E-04

NOTES
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process c

METHODOLOGY
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode u
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

Appendix A: Emission Calculations
PTE Summary

Company Name: **Dutchmen Manufacturing, Inc.**
Address: **0965 N 1550 W, Middlebury, IN 46540**
FESOP Permit : **087-21758-00062**
Prepared by: **ERG/HJ**
Date: **September 19, 2005**

Pollutant	Surface Coating	PVC Pipe Cutting	Woodworking	Natural Gas Combustion	Insignificant Woodworking	Welding	Total (tpy)
CO	0.00	0.00	0.00	1.99	0.00	0.00	**1.99**
NO_x	0.00	0.00	0.00	2.37	0.00	0.00	**2.37**
PM/PM_{10}	0.08	2.02	1633	0.18	2.02	0.00	**1.64E+03**
SO_2	0.00	0.00	0.00	5.00E-03	0.00	0.00	**5.00E-03**
VOC	23.4	0.00	0.00	0.13	0.00	0.00	**23.5**
Pb	0.00	0.00	0.00	1.18E-05	0.00	0.00	**1.18E-05**
Individual HAPs							
Toluene	0.36	0.00	0.00	8.04E-05	0.00	0.00	**0.36**
Hexane	0.25	0.00	0.00	0.04	0.00	0.00	**0.29**
MEK	2.07	0.00	0.00	0.00	0.00	0.00	**2.07**
Total HAP	2.20	0.00	0.00	0.04	0.00	4.73E-04	**2.25**

Note: The three HAPs emitted in the largest quantities appear in the summary table.