



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 12, 2007
RE: K.Z., Inc. / 087-21974-00063
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

K-Z, Inc.
9270 West US 20
Shipshewana, Indiana 46565

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

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 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 certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-6.1-6, applicable to those conditions

Operation Permit No.: MSOP 087-21974-00063	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 12, 2007 Expiration Date: January 12, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary source manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers.

Authorized Individual: President
Source Address: 9270 West US 20, Shipshewana, IN 46565
Mailing Address: 9270 West US 20, Shipshewana, IN 46565
General Source Phone: 260-768-4016
SIC Code: 3792
County Location: LaGrange
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Plant 1:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

- (a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

- (a) One (1) RV assembly operation, constructed in April 2003, identified as EUB-4, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.63 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-4, using 9100 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2003, identified as EUE-4, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-4, rated at 150,000 Btu per hour.

Plant 5:

- (a) One (1) RV assembly operation, constructed in February 1999, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.38 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7800 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.

Plant 6:

- (a) One (1) RV assembly operation, constructed in April 2004, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.5 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2800 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Plant 7A:

- (a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.88 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4900 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

- (a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.13 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6300 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

- (a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.75 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, identified as EUA-19, using 4200 pounds of wood per hour, exhausting through general ventilation.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

-
- (a) This permit, M087-21974-00063, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 an "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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M087-21974-00063 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) Incorporated as originally stated,
 - (2) Revised, or
 - (3) Deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source, except. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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.5 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.6 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 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

C.10 Response to Excursions or Exceedances

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

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

C.11 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements[326 IAC 2-6.1-5]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

Plant 1:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

- (a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

- (a) One (1) RV assembly operation, constructed in April 2003, identified as EUB-4, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.63 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-4, using 9100 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2003, identified as EUE-4, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-4, rated at 150,000 Btu per hour.

Plant 5:

- (a) One (1) RV assembly operation, constructed in February 1999, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.38 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7800 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.

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

Emissions Unit Description:

Plant 6:

- (a) One (1) RV assembly operation, constructed in April 2004, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.5 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2800 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Plant 7A:

- (a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.88 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4900 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

- (a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.13 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6300 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

- (a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.75 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, identified as EUA-19, using 4200 pounds of wood per hour, exhausting through general ventilation.

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

Emission Limitations and Standards

D.1.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the eight (8) natural gas-fired boilers, identified as EUD-1, EUD-2, EUD-3, EUD-4, EUD-5, EUD-6, EUD-7A, EUD-7B rated at 0.15 MMBtu/hr each shall not exceed six-tenths (0.6) pounds per million British thermal units (MMBtu), individually.

D.1.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from woodworking operations in Plant 2 shall not exceed 5.37 pounds per hour when operating at a process weight rate of 1.5 tons of wood per hour.

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

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

$$E = 4.10 (0.6)^{0.67} = 5.37 \text{ lbs PM/hr}$$

The cyclone shall be in operation at all times the woodworking operations in Plant 2 are in operation, in order to comply with the limit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	K-Z, Inc.
Address:	9270 West US 20, Shipshewana, IN 46565
City:	Shipshewana
Phone #:	260-768-4016
MSOP #:	087-21974-00063

I hereby certify that K-Z, Inc. is still in operation.
 no longer in operation.

I hereby certify that K-Z, Inc. is in compliance with the requirements of MSOP 087-21974-00063.
 not in compliance with the requirements of MSOP 087-21974-00063.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for a New Source Construction and Minor Source
Operating Permit (MSOP)

Source Background and Description

Source Name:	K-Z, Inc.
Source Location:	9270 West US 20, Shipshewana, IN 46565
County:	LaGrange
SIC Code:	3792
Operation Permit No.:	087-21974-00063
Permit Reviewer:	Ganesh Srinivasan/EVP

The Office of Air Quality (OAQ) has reviewed an application from K-Z, Inc. relating to the operation of a source manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers.

Permitted Emission Units and Pollution Control Equipment

There are no permitted Emission Units operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

The source also consists of the following unpermitted emission units:

Plant 1:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

- (a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3000 pounds of wood per hour, exhausting through general ventilation.
- (b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

- (a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

- (a) One (1) RV assembly operation, constructed in April 2003, identified as EUB-4, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.63 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-4, using 9100 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2003, identified as EUE-4, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-4, rated at 150,000 Btu per hour.

Plant 5:

- (a) One (1) RV assembly operation, constructed in February 1999, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.38 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7800 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.

Plant 6:

- (a) One (1) RV assembly operation, constructed in April 2004, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.5 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2800 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Plant 7A:

- (a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.88 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4900 pounds of wood per hour, exhausting through general ventilation.
- (c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

- (a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 1.13 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6300 pounds of wood per hour, exhausting through general ventilation.
- (c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, each rated at 480,000 Btu per hour.
- (d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

- (a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic and metal, assembling 0.75 units per hour, exhausting through general ventilation.
- (b) Woodworking operations, identified as EUA-19, using 4200 pounds of wood per hour, exhausting through general ventilation.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the operation 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 application for the purposes of this review was received on November 14, 2005, with additional information received on February 1, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 6)

Potential to Emit Before Controls

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/yr)
PM	81.62
PM-10	81.77
SO ₂	0.01
VOC	45.92
CO	1.68
NO _x	2.00

HAPs	Potential to Emit (tons/yr)
Toluene	7.11
Glycol Ether	0.01
Tetrachloro	2.98
MEK	1.06
Hexane	2.54
Dibutyl Phthalate	0.37
Total	14.10

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of the combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not a major source of HAPs as defined in 326 IAC 2-7-1 (22).
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Unclassifiable or Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (b) LaGrange County has been classified as unclassifiable or 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.
- (c) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Source Status

New Source PSD 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	2.96
PM-10	3.11
SO ₂	0.01
VOC	45.92
CO	1.68
NO _x	2.00
Single HAP	7.15
Combination HAPs	14.10

- (a) This new source is not a major stationary source because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in the permit for the eight (8) natural gas-fired Boilers, identified as emission units EUD-1, EUD-2, EUD-3, EUD-4, EUD-5, EUD-6, EUD-7A, EUD-7B, with a maximum heat input capacity of 150,000 Btu per hour each because their capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this review.
- (c) The source is not a major source of HAPs. Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ are not included in this review.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability – Entire Source

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

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

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in 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 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions. This rule applies to any new source of fugitive particulate emissions which did not received all the necessary preconstruction approvals before December 13, 1985. All the particulate emissions at this source are venting indoors. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

- (a) Boiler EUD-1, rated at 150,000 Btu per hour, constructed in 1999, is subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 MMBtu/hr

$$Pt = 1.09 / (0.15)^{0.26} = 1.78 \text{ pounds per MMBtu}$$

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

The potential worst case emissions from this boiler of 0.001 lb/MMBtu of particulate matter is less than the allowable 0.6 pounds per MMBtu. Therefore, this boiler is in compliance with this rule.

- (b) Boilers EUD-2 and EUD-3, rated at 150,000 Btu per hour each, both constructed in 2000, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boilers shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 = 0.45 MMBtu/hr

$$Pt = 1.09 / (0.45)^{0.26} = 1.34 \text{ pounds per MMBtu}$$

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

The potential worst case emissions from the boilers of 0.001 lb/MMBtu of particulate matter is less than the allowable 0.6 pounds per MMBtu. Therefore, the boilers are in compliance with this rule.

- (c) Boilers EUD-4 and EUD-5, rated at 150,000 Btu per hour each, constructed in 2003, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boilers shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 + 0.30 = 0.75 MMBtu/hr

$$Pt = 1.09 / (0.75)^{0.26} = 1.01 \text{ pounds per MMBtu}$$

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

The potential worst case emissions from the boilers of 0.001 lb/MMBtu of particulate matter is less than the allowable 0.6 pounds per MMBtu. Therefore, the boilers are in compliance with this rule.

- (d) Boiler EUD-6, rated at 150,000 Btu per hour, constructed in 2004, is subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 + 0.30 + 0.15 = 0.90 MMBtu/hr

$$Pt = 1.09 / (0.90)^{0.26} = 1.12 \text{ pounds per MMBtu}$$

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

The potential worst case emissions from this boiler of 0.001 lb/MMBtu of particulate matter is less than the allowable 0.6 pounds per MMBtu. Therefore, this boiler is in compliance with this rule.

- (e) Boilers EUD-7A and EUD-7B, rated at 150,000 Btu per hour each, both constructed in 2005, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour
(MMBtu/hr) heat input = 0.15 + 0.30 + 0.30 + 0.15 + 0.30

Q = 1.15 MMBtu/hr

Pt = $1.09 / (1.15)^{0.26} = 1.05$ pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.
Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

The potential worst case emissions from the boilers of 0.001 lb/MMBtu of particulate matter is less than the allowable 0.6 pounds per MMBtu. Therefore, the boilers are in compliance with this rule.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from woodworking operations in Plant 2 shall not exceed 5.37 pounds per hour when operating at a process weight rate of 1.5 tons of wood per hour.

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

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

$E = 4.10 (0.6)^{0.67} = 5.37$ lbs PM/hr

The cyclone shall be in operation at all times the woodworking operations in Plant 2 are in operation, in order to comply with the limit.

Woodworking operations at other plants have potential particulate emissions less than 0.551 pounds per hour. Therefore, the rule is not applicable to woodworking operations at the remaining plants.

326 IAC 8-1-6 (Volatile Organic Compounds)

This source is not subject to this rule. This rule applies to facilities constructed after January 1980, which have potential VOC emissions of 25 tons or more per year, and are not regulated by any other provisions of 326 IAC 8. All the facilities (EUB-4, EUB-5, EUB-6, EUB-7A, EUB-7B and EUB-19) at this source were constructed after January 1980, but each has potential VOC emissions of less than 25 tons per year, therefore, this rule does not apply.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. This rule is not applicable to the source since potential VOC emissions are less than fifteen (15) pounds per day for each emission unit.

326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 are not applicable to this source, since this source does not perform surface coating of wood furniture or cabinets. All wood furniture and wood furniture components installed in the travel trailers are shipped to the source pre-manufactured and pre-coated. Surface coating of wood at this source consists of surface coating of structural wood with adhesives, which is not subject to this rule.

Conclusion

The operation of this unit manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers, shall be subject to the conditions of the Minor Source Operating Permit 087-21974-00063.

Appendix A: Emissions Calculations

Emission Calculation Summary

Company Name: K-Z, Inc.
Address City IN Zip: 9270 West US 20, Shipshewana, IN 46565
Permit Number: 089-21974-00063
Plt ID: 089-00063
Reviewer: GSN/EVP
Date: 12/22/05

Uncontrolled Potential Emissions (tons/year)								
Emission Unit	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Combined HAPs
Woodworking Operation	81.58	81.58	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00
Assembly Operations	0.00	0.00	0.00	45.81	0.00	0.00	7.11	14.07
Combustion	0.04	0.15	0.01	0.11	1.68	2.00	0.04	0.04
Total	81.62	81.77	0.01	45.92	1.68	2.00	7.15	14.10

Woodworking Emission Calculation

Company Name: K-Z, Inc.
 Address City IN Zip: 9270 West US 20, Shipshewana, IN 46565
 Permit Number: 089-21974-00063
 Plt ID: 089-00063
 Reviewer: GSN/EVP
 Date: 12/22/05

Uncontrolled Potential Emissions* (tons/year)				
Plant Name	Grain Loading	Air Flow Rate	PM Emissions lbs/hr	PM Emissions tons/year
Plant 1	0.105	7,800	7.02	30.75
Plant 2	0.121	2,725	2.83	12.38
Plant 4	0.015	2,725	0.35	1.53
Plant 5	0.042	7,800	2.81	12.30
Plant 6	0.066	4,968	2.81	12.31
Plant 7A & 7B	0.083	3,950	2.81	12.31
			Total	81.58

* Based on 8760 Hours of Operation

Controlled Potential Emissions (tons/year)				
Plant Name	Dust Collector Type	Control Efficiency	PM Emissions lbs/hr	PM Emissions tons/year
Plant 1	Baghouse	99.90%	0.01	0.03
Plant 2	Cyclone	80.00%	0.57	2.48
Plant 4	Baghouse	98.00%	0.01	0.03
Plant 5	Baghouse	99.90%	0.00	0.01
Plant 6	Baghouse	98.50%	0.04	0.18
Plant 7A & 7B	Baghouse	98.50%	0.04	0.18
			Total	2.92

* Based on 8760 Hours of Operation

**Appendix A: Emissions Calculations
Welding Emission Calculations**

Company Name: K-Z, Inc.
Address City IN Zip: 9270 West US 20, Shipshewana, IN 46565
Permit Number: 089-21974-00063
Pit ID: 089-00063
Reviewer: GSN/EVP
Date: 12/22/05

Welding	Max Electrode Consumption (lbs/year)	Emission Factor (lb/10 ³ lb wire consumed)			Emissions (tons/yr)		
		PM10	Cr	Mn	PM10	Cr	Mn
MIG Welding	3,504	0.002400	0.000001	0.000020	0.037	0.000	0.000

Note:

Emission Factors for MIG welding are based on AP-42 Emission Factors, Chapter 12.19

Emissions (tons/year) = Max Electrode Consumption (lbs/year) * Emission Factor(lb/10³ lb) * 8760 hours * (1ton/2000 lbs)

Appendix A: Emissions Calculations

Woodworking Emission Calculation

Company Name: K-Z, Inc.
 Address City IN Zip: 9270 West US 20, Shipshewana, IN 46565
 Permit Number: 089-21974-00063
 Plt ID: 089-00063
 Reviewer: GSN/EVP
 Date: 12/22/05

Product Name	Material Used On	Density	Usage	VOC Content	Toluene	Glycol Ether	Tetrachloro	Xylene	MEK	Hexane	Dibutyl Phthalate	VOC Emissions	Toluene Emissions	Glycol Ether Emissions	Tetrachloro Emissions	Xylene Emissions	MEK Emissions	Hexane Emissions	Dibutyl Phthalate Emissions
		(lbs/gal)	(lb/hr)	(lbs/gal)	(wt %)	(wt %)	(wt %)	(wt %)	(wt %)	(wt %)	(wt %)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
8011 Thermoplastic Rubber	Plastic	8.75	28.99	0.044	0%	0%	0%	0%	0%	0%	0%	0.146	0.000	0.000	0.000	0.000	0.000	0.000	0.000
1010 Solvent Dispersion	Wood or Plastic	9.58	4.28	3.550	37%	0%	0%	0%	0%	0%	0%	1.586	1.584	0.000	0.000	0.000	0.000	0.000	0.000
1021 Low VOC Sealant 8125	Wood or Plastic	11.16	27.79	2.250	0%	0%	0%	0%	0%	0%	0%	5.603	0.000	0.000	0.000	0.000	0.000	0.000	0.000
C-192 Cyclo Max	Misc Cleaner	8.58	0.39	0.270	0%	0%	0%	0%	0%	0%	0%	0.012	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2300 MH/RV	Wood or Plastic	8.33	0.02	0.830	0%	10%	0%	0%	0%	0%	0%	0.002	0.000	0.002	0.000	0.000	0.000	0.000	0.000
Cyclo Battery Protector	**Metal	9.91	0.10	4.620	0%	0%	0%	0%	0%	0%	0%	0.047	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Weld on Pipe Cement for ABS	Plastic	5.91	0.01	4.320	15%	0%	0%	1%	0%	0%	0%	0.007	0.002	0.000	0.000	0.000	0.000	0.000	0.000
Cyclo Parts Cleaner	Misc Cleaner	7.63	0.00	3.340	0%	0%	0%	0%	75%	0%	0%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Silicone Spray	Misc Lubricant	13.50	0.68	0.000	0%	0%	100%	0%	0%	0%	0%	0.000	0.000	0.000	0.680	0.000	0.000	0.000	0.000
DC13011 Silaprene Adhesive	Metal	5.58	0.13	3.350	0%	0%	0%	0%	0%	0%	0%	0.078	0.000	0.000	0.000	0.000	0.000	0.000	0.000
De-Solv	Cleanup (Plastic)	8.09	1.65	2.800	0%	0%	0%	0%	15%	0%	0%	0.571	0.000	0.000	0.000	0.000	0.243	0.000	0.000
Tylan Cleaner	Cleanup (Plastic)	5.62	0.54	5.620	0%	0%	0%	0%	0%	0%	0%	0.540	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Mobilebond 44	Wood or Plastic	6.58	0.60	1.440	0%	0%	0%	0%	0%	0%	0%	0.131	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3015 Anti-Wick	Wood or Plastic	9.50	1.90	0.095	0%	0%	0%	0%	0%	0%	0%	0.019	0.000	0.000	0.000	0.000	0.000	0.000	0.000
MS101	Wood or Plastic	8.90	2.78	0.301	0%	0%	0%	0%	0%	0%	3%	0.094	0.000	0.000	0.000	0.000	0.000	0.000	0.083
Panel Hold	Wood or Plastic	7.50	0.01	2.740	0%	0%	0%	0%	0%	0%	0%	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3050 Synthetic Latex	Wood or Plastic	6.58	0.02	0.920	0%	0%	0%	0%	0%	0%	0%	0.003	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Econobond 29	Wood or Plastic	9.00	2.25	0.090	2%	0%	0%	0%	0%	0%	0%	0.023	0.038	0.000	0.000	0.000	0.000	0.000	0.000
Total		5.75	2.90	3.160	0%	0%	0%	0%	0%	20%	0%	1.594	0.000	0.000	0.000	0.000	0.000	0.580	0.000
												lb/hr	10.459	1.623	0.002	0.680	0.000	0.243	0.580
												tons/yr	45.81	7.11	0.01	2.98	0.00	1.06	2.54
																			HAPs Total
																			14.07

Plant Name	Production Rate	VOC Emissions
		TPY
Plant 4	1.63	11.95
Plant 5	1.38	10.11
Plant 6	0.5	3.66
Plant 7A	0.88	6.45
Plant 7B	1.13	8.28
Plant 19	0.75	5.50
Total	6.25	45.81

** Usage is mainly associated with maintenance related activities

Note: The daily emissions of the adhesive which is applied on a metal surface is = (0.571 lbs/hr * 24 hrs/day) = 13.7 lbs/day. Hence, 326 IAC 8-2-9 is not applicable.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Boilers & Thermo Cyclers**

**Company Name: K-Z, Inc.
Address City IN Zip: 9270 West US 20, Shipshewana, IN 46565
Permit Number: 089-21974-00063
Plt ID: 089-00063
Reviewer: GSN/EVP
Date: 12/22/05**

Heat Input Capacity MMBtu/hr	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8 Boilers	1.2	
7 Thermo Cyclers	3.4	
Total	4.6	39.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.04	0.15	0.01	2.00	0.11	1.68

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See next page for HAPs emissions calculations.

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

Company Name: K-Z, Inc.
Address City IN Zip: 9270 West US 20, Shpshewana, IN 46565
Permit Number: 089-21974-00063
Plt ID: 089-00063
Reviewer: GSN/EVP
Date: 12/22/05

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.194E-05	2.397E-05	1.498E-03	3.595E-02	6.791E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.986E-06	2.197E-05	2.796E-05	7.590E-06	4.194E-05

Total 3.769E-02

Methodology is the same as previous page.

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