INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: August 11, 2006

RE: Heartland Recreational Vehicles, LLC / 039-22971-00621

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

HEARTLAND RECREATIONAL VEHICLES, LLC
1001 All Pro Drive
Elkhart, Indiana 46514

(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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or 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.

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.

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.: F039-22971-00621	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 11, 2006 Expiration Date: August 11, 2011

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS 6
B.1 Definitions [326 IAC 2-8-1]
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-7]
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
B.5 Term of Conditions [326 IAC 2-1.1-9.5]
B.6 Enforceability [326 IAC 2-8-6]
B.7 Severability [326 IAC 2-8-4(4)]
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.14 Emergency Provisions [326 IAC 2-8-12]
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.18 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]
B.19 Permit Renewal [326 IAC 2-8-3(h)]
B.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.22 Source Modification Requirement [326 IAC 2-8-11.1]
B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.25 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]
B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 16

Emission 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]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS
Travel Trailer Assembly and Finishing Operations (EU-01 and EU-02) 23

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 Hazardous Air Pollutants (HAPs) Limit [326 IAC 2-8-4]
D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-1]

Compliance Determination Requirements
D.1.3 Hazardous Air Pollutants (HAPs)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.4 Record Keeping Requirements
D.1.5 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS
Millshops (MS-01 and MS-02) 25

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.2.1 Particulate [326 IAC 6-3-2]
D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.2.3 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.2.4 Visible Emissions Notations
D.2.5 Baghouse Inspections
D.2.6 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.2.7 Record Keeping Requirements

Certification Form 28
Emergency Occurrence Form 29
Quarterly Report Form 31
Quarterly Deviation and Compliance Monitoring Report Form……..32

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 non-motorized travel trailer manufacturing plant.

Authorized Individual:	Vice President of Operations
Source Address:	1001 All Pro Drive, Elkhart, IN 46514
Mailing Address:	1001 All Pro Drive, Elkhart, IN 46514
General Source Phone Number:	574-262-5992
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Basic Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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) travel trailer assembly and finishing operation, designated as EU-01, constructed in 2005, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, and caulks using flow, roll, and brush applications, and paints using less than five (5) gallons of paint per day, with a maximum throughput of 1.25 trailers per hour, venting to the indoors;

(b) one (1) travel trailer assembly and finishing operation, designated as EU-02, constructed in 2006, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, and caulks, using flow, roll, and brush applications, and paints using less than five (5) gallons of paint per day, with a maximum throughput of 1.25 trailers per hour, venting to the indoors;

(c) one (1) woodworking operation, designated as Millshop MS-01, constructed in 2005, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A-3 and DC-1200A-3, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

(d) one (1) woodworking operation, designated as Millshop MS-02, constructed in 2006, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput

capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(1) two (2) natural gas-fired Thermo Cycle heaters, designated as H-01 and H-02, each rated at 0.464 MMBtu/hr;

(2) two (2) natural gas-fired office furnaces, designated as H-03 and H-04, each rated at 0.09 MMBtu/hr;

(3) two (2) natural gas-fired Thermo Cycle heaters, designated as H-05 and H-06, each rated at 1.3 MMBtu/hr; and

(4) two (2) natural gas-fired office furnaces, designated as H-07 and H-08, each rated at 0.09 MMBtu/hr.

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).

SECTION B GENERAL CONDITIONS

B.1 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.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-7]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-7 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F039-22971-00621, 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.5 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.6 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.7 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.8 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.9 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 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.10 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.11 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.12 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 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, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.13 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 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.14 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 describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(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 an "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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-22971-00621 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.16 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.17 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 Provisions), 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 an "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.18 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 Federally Enforceable State Operating Permit 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 an "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.19 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 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 nine (9) months 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 2-8 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 being needed to process the application.

B.20 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 an "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.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a 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, for 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 in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

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

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

B.22 Source Modification 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.23 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.24 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 an "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.25 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.26 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

Emission 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) The 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 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.9 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.10 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 the inability to meet this date.

The notification 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).

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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.14 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.15 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 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.17 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(e) 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.

(f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) one (1) travel trailer assembly and finishing operation, designated as EU-01, constructed in 2005, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, and caulks using flow, roll, and brush applications, and paints using less than five (5) gallons of paint per day, with a maximum throughput of 1.25 trailers per hour, venting to the indoors;

(b) one (1) travel trailer assembly and finishing operation, designated as EU-02, constructed in 2006, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, and caulks using flow, roll, and brush applications, and paints using less than five (5) gallons of paint per day, with a maximum throughput of 1.25 trailers per hour, venting to the indoors;

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

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

D.1.1 Hazardous Air Pollutants (HAPs) Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the input of any single HAP and any combination of HAPs, including adhesives, caulks, sealants, paints and clean up solvents, to the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 combined shall be less than 9.9 and 24.9 tons per 12 consecutive month period, respectively, with compliance determined at the end of each month. These usage limits are required to limit the source-wide potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons per 12 consecutive month period, respectively. Compliance with these limits make 326 IAC 2-7 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-1]

(a) Any change or modification which may increase the actual VOC emissions associated with surface coating of metal to fifteen (15) pounds per day or more from the travel trailer assembly and finishing operation, designated as EU-01 must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations) before such change can occur.

(b) Any change or modification which may increase the actual VOC emissions associated with surface coating of metal to fifteen (15) pounds per day or more from the travel trailer assembly and finishing operation, designated as EU-02 must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations) before such change can occur.

Compliance Determination Requirements

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (3) below. Records maintained for (1) and (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount of HAPs in the coating material, adhesives, caulks, sealants and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The amount of each coating material, adhesive, caulks, sealants and solvent used on a monthly basis.

(3) The single and combined HAP usages for each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of the VOC usage for each day.

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

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) one (1) woodworking operation, designated as Millshop MS-01, constructed in 2005, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A-3 and DC-1200A-3, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

(d) one (1) woodworking operation, designated as Millshop MS-02, constructed in 2006, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

(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 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each Millshop MS-01 and MS-02 shall not exceed 2.91 pounds per hour when operating at a process weight rate of 0.6 tons per hour.

The pounds per hour limitation was calculated with 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.2.2 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 Millshops MS-01 and MS-02 and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

(a) The dust collectors for particulate control shall be in operation and control emissions from Millshops MS-01 and MS-02 at all times that Millshops MS-01 and MS-02 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.

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

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of the Millshops MS-01 and MS-02 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 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.2.6 Broken or Failed Bag Detection

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

(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 line. 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.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the Millshops MS-01 and MS-02 stack exhausts.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Heartland Recreational Vehicles, LLC Plant 2
Source Address: 1001 All Pro Drive, Elkhart, IN 46514
Mailing Address: 1001 All Pro Drive, Elkhart, IN 46514
FESOP No.: F039-22971-00621

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: Heartland Recreational Vehicles, LLC Plant 2
Source Address: 1001 All Pro Drive, Elkhart, IN 46514
Mailing Address: 1001 All Pro Drive, Elkhart, IN 46514
FESOP No.: F039-22971-00621

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

FESOP Quarterly Report

Source Name: Heartland Recreational Vehicles, LLC Plant 2
Source Address: 1001 All Pro Drive, Elkhart, IN 46514
Mailing Address: 1001 All Pro Drive, Elkhart, IN 46514
FESOP No.: F039-22971-00621
Facility: Travel trailer assembly and finishing operations EU-01 and EU-02
Parameter: Single and Combined HAPs Usage
Limit: HAP input of less than 9.90 and 24.9 tons of worst-case single HAP and any combination of HAPs, respectively, including clean up solvents, per 12 consecutive month period, with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

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

Source Name: Heartland Recreational Vehicles, LLC Plant 2
Source Address: 1001 All Pro Drive, Elkhart, IN 46514
Mailing Address: 1001 All Pro Drive, Elkhart, IN 46514
FESOP No.: F039-22971-00621

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

Page 1 of 2

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

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

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

Source Background and Description

Source Name:	**Heartland Recreational Vehicles, LLC Plant 2**
Source Location:	**1001 All Pro Drive, Elkhart, IN 46514**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**FESOP 039-22971-00621**
Permit Reviewer:	**Alic Bent /EVP**

On June 30, 2006, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Heartland Recreational Vehicles, LLC Plant 2 had applied for a Federally Enforceable State Operating Permit (FESOP) to modify and operate a non-motorized travel trailer manufacturing plant. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~):

1. The descriptive information in Sections A.2 and D.1 for the EU-01 and EU-02 Assembly and Finishing Operations have been revised to remove the dry filter control device. The plant is not required to use dry filter controls when applying sealant, caulks, and adhesives since the applicators which are used are assumed to have 100% transfer efficiency. Therefore, there are no particulate matter emissions from this operation when applying sealant, caulks, and adhesives. Pursuant to 326 IAC 6-3-1 (b)(15), the paint application portion of the EU-01 and EU-02 Assembly and Finishing Operations is exempt from 326 IAC 6-3-2(d) requirements, because less than five (5) gallons of paint per day is used. Therefore, the requirements of 326 IAC 6-3-2(d) do not apply to EU-01 and EU-02.

   (a) one (1) travel trailer assembly and finishing operation, designated as EU-01, constructed in 2005, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, caulks **using flow, roll, and brush applications,** and paints **using less than five (5) gallons of paint per day**, with a maximum throughput of 1.25 trailers per hour, ~~with overspray controlled by dry filters and~~ venting to the indoors;

   (b) one (1) travel trailer assembly and finishing operation, designated as EU-02, constructed in 2006, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, caulks **using flow, roll, and brush applications,** and paints **using less than five (5) gallons of paint per day**, with a maximum throughput of 1.25 trailers per hour, ~~with overspray controlled by dry filters and~~ venting to the indoors;

2. Conditions D.1.3, D.1.4, D.1.6, and D.1.7(c) have been removed, since without dry filter controls the Preventive Maintenance Plan, Compliance Monitoring and Recordkeeping conditions are not required.

~~D.1.3 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to 326 IAC 6-3-2(d), particulate from the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

~~D.1.4 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 the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 and their control devices.~~

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

~~D.1.6 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation when venting to the atmosphere. If a condition exists which should result in a response step, 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.~~

~~(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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.~~

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

D.1.~~7~~**4** Record Keeping Requirements

~~(c) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.~~

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Heartland Recreational Vehicles, LLC Plant 2**
Source Location:	**1001 All Pro Drive, Elkhart, IN 46514**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**F039-22971-00621**
Permit Reviewer:	**Alic Bent/EVP**

The Office of Air Quality (OAQ) has reviewed an application from Heartland Recreational Vehicles, LLC Plant 2 relating to the operation of a stationary non-motorized travel trailer manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

(a) one (1) travel trailer assembly and finishing operation, designated as EU-01, constructed in 2005, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, caulks and paints, with a maximum throughput of 1.25 trailers per hour, with overspray controlled by dry filters and venting to the indoors;

(b) one (1) woodworking operation, designated as Millshop MS-01, constructed in 2005, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A-3 and DC-1200A-3, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following:

(a) one (1) travel trailer assembly and finishing operation, designated as EU-02, to be constructed in 2006, which assembles non-motorized travel trailers from primarily pre-manufactured and pre-coated components using sealants, adhesives, caulks and paints, with a maximum throughput of 1.25 trailers per hour, with overspray controlled by dry filters and venting to the indoors;

(b) one (1) woodworking operation, designated as Millshop MS-02, to be constructed in 2006, consisting of cutting, sawing, drilling, and/or routing of wood, with a maximum throughput capacity of 0.6 tons of wood per hour, and with particulate emissions from the emission units controlled by two (2) baghouse dust collectors, identified as DC-1900A, each with an internal return air system, a control efficiency of 99.9%, and a maximum design grain loading of less than or equal to 0.03 grain per actual cubic foot of outlet air, when operated at gas flow rates of one thousand nine hundred (1,900) and one thousand two hundred (1,200) actual cubic feet per minute (acfm), respectively. The woodworking operation consists of the following emission units:

(1) One (1) table saw for cutting of wood;
(2) Three (3) chop saws for cutting of wood;
(3) One (1) band saw for cutting of wood;
(4) One (1) drill press for drilling and/or routing of wood;
(5) Miscellaneous hand operated saws, routers, and drills.

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(1) two (2) natural gas-fired Thermo Cycle heaters, designated as H-01 and H-02, each rated at 0.464 MMBtu/hr;

(2) two (2) natural gas-fired office furnaces, designated as H-03 and H-04, each rated at 0.09 MMBtu/hr;

(3) two (2) natural gas-fired Thermo Cycle heaters, designated as H-05 and H-06, each rated at 1.3 MMBtu/hr; and

(4) two (2) natural gas-fired office furnaces, designated as H-07 and H-08, each rated at 0.09 MMBtu/hr.

Existing Approvals

The source has been operating under the previous Registration 039-20803-00621 issued on March 1, 2005.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
H-05	Natural Gas-fired Heaters	23.5 - 25	0.25 – 0.5	100 est.	77 est.
H-06	Natural Gas-fired Heaters	23.5 - 25	0.25 – 0.5	100 est.	77 est.
H-07	Natural Gas-fired Heaters	23.5 - 25	0.25 – 0.5	100 est.	77 est.
H-08	Natural Gas-fired Heaters	23.5 - 25	0.25 – 0.5	100 est.	77 est.

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 application for the purposes of this review was received on March 13, 2006.

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

Emission Calculations

See Appendix A: pages 1 through 5 of this document for detailed emission calculations.

Based on information provided by the source, the source applies sealers, caulks, adhesives, and touch-up paint surface coatings to wood, plastic, and metal surfaces. These coating are applied using hand-held aerosol cans or hand-held caulk guns. The table below summarizes the types of surfaces being coated and the surface coatings applied to these surfaces:

Type of Surface Coated	Surface Coating Material
Metal	Silkaflex 552 Adhesive Rust-Oleum 2402 Gloss Black (minimal amounts)
Plastic*	502 Silicone Sealant Caulk 8011 Latex Sealer Adhesive P1015 Low VOC Sealer Rust-Oleum 2402 Gloss Black (primarily)
Wood	Rust-Oleum 2402 Gloss Black (primarily)

*Plastic consists primarily of RV exterior, which is made of fiber reinforced plastic
Note: Less than 50% of plastic or wood unit is metal.

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, inclulding 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	10.64
PM-10	10.74
SO_2	0.01
VOC	28.55
CO	1.43
NO_x	1.70

HAPs	Potential to Emit (tons/yr)
Toluene	11.22
Xylene	0.84
Ethylbenzene	0.42
Total	12.48

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) 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) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

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

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Booths (EU-01 and EU-02)	0.01 (1)	0.01 (1)	0.00	28.46	0.00	0.00	Single HAP < 9.90 Total HAPs < 24.9 (2)
Milling Shops (MS01 and MS02)	0.011	0.011	0.00	0.00	0.00	0.00	0.00
Heaters and Thermocyclers	0.03	0.13	0.01	0.09	1.43	1.70	Neg.
Total Emissions	0.05	0.15	0.01	28.55	1.43	1.70	Single HAP < 10 Total HAPs < 25

(1) Based on controlled PM and PM10 potential emissions.
(2) Based on 326 IAC 2-8-4 (FESOP) limitations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Elkhart 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) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other regulated 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.07
PM-10	0.09
SO_2	Neg.
VOC	14.2
CO	0.41
NO_x	0.49
Single HAP	5.61
Combination HAPs	6.25

(a) This existing source is not a major stationary source 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.

(b) These emissions were based on the Registration 039-20803-00621 issued on March 1, 2005.

Federal Rule Applicability

(a) This source is not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart MM, Automobile and Light Duty Truck Surface Coating Operations (40 CFR Parts 60.390 - 60.398) (326 IAC 12), because the source has opted to limit the source-wide emissions of any single HAP and any combination of HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and is not involved in the surface coating of automobiles or light duty trucks. This source assembles non-motorized travel trailers for attachment to passenger cars or other vehicles using pre-manufactured components.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR Part 63.800 - 63.808) (326 IAC 20-14-1), because the source has opted to limit the source-wide emissions of any single HAP and any combination of HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and it does not manufacture wood furniture or wood furniture components. All wood furniture and wood furniture components installed in the travel trailers are shipped to the source pre-manufactured and pre-coated.

(c) The National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in this permit because this rule only applies to boilers or process heaters located at a major source of HAPs. The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart DDDDD do not apply to this source.

(d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart PPPP, Surface Coating of Plastic Parts and Products, because the source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart PPPP do not apply to this source.

(e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because the source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart MMMM do not apply to this source.

(f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)
Pursuant to 326 IAC 2-2 (PSD), this existing minor source, originally constructed in 2005 after the August 7, 1977 rule applicability date, is not considered a major source. This source is not one of the 28 listed source categories and it has never operated at, and does not have the potential to emit of 250 tons per year (tpy) or more of any regulated pollutant. Therefore, 326 IAC 2-2 (PSD) does not apply.

326 IAC 2-3 (Emission Offset)
The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. The uncontrolled potential to emit of VOC and NOx are each less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP). The source has unlimited potential emissions of greater than 10 tons per year of single HAP and 25 tons per year of any combination of HAPs. The source has opted to limit the source-wide emissions of any single HAP and any combination of HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. 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 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source shall use less than 9.90 and 24.9 tons of any single HAP and any combination of HAPs, respectively, including adhesives, caulks sealants, paints and clean up solvents, per 12 consecutive month period for the travel trailer assembly and finishing operations, designated as EU-01 and EU-02, with compliance determined at the end of each month. The usage limits are required to limit the source-wide potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

Compliance with the HAP usage limits for the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 shall make 326 IAC 2-7 (Part 70) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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).

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 4-2-2 (Incinerators)

The natural gas-fired space heaters and furnaces are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, the natural gas-fired space heaters and furnaces are not subject to 326 IAC 4-2-2.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired heaters and furnaces are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 shall be controlled by the dry filters**,** and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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 each Millshop MS-01 and MS-02 shall not exceed 2.91 pounds per hour when operating at a process weight rate of 0.6 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

$E = 4.10\ (0.6)^{0.67} = 2.91$ lbs PM/hr

The dust collectors shall be in operation at all times the respective millshops are in operation, in order to comply with the limit.

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

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. Each of the travel trailer assembly and finishing operations, designated as EU-01 and EU-02 has unlimited potential to emit VOC of less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

The provisions of 326 IAC 8-2-2 are not applicable to this source. This rule applies to facilities engaging in automobile and light duty truck surface coating operations which include all passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 8,500 pounds gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles. Heartland Recreational Vehicles LLC, Plant 2 coats only non-motorized travel trailers. Therefore the requirements of 326 IAC 8-2-2 do 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.

(a) The travel trailer assembly and finishing operation, designated as EU-01 has actual VOC emissions associated with surface coating of metal of less than fifteen (15) pounds per day, therefore, 326 IAC 8-2-9 does not apply. Any change or modification which may increase the actual VOC emissions associated with surface coating of metal to fifteen (15) pounds per day or more from the travel trailer assembly and finishing operation, designated as EU-01 must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations) before such change can occur.

(b) The travel trailer assembly and finishing operation, designated as EU-02 has actual VOC emissions associated with surface coating of metal of less than fifteen (15) pounds per day, therefore, 326 IAC 8-2-9 does not apply. Any change or modification which may increase the actual VOC emissions associated with surface coating of metal to fifteen (15) pounds per day or more from the travel trailer assembly and finishing operation, designated as EU-01 must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations) before such change can occur.

326 IAC 8-2-10 (Volatile Organic Compounds, Flat Wood Panels Manufacturing Operations)
The requirements of 326 IAC 8-2-10 are not applicable to this source, since this source does not perform manufacturing of flat wood panels.

326 IAC 8-2-11 (Volatile Organic Compounds, Fabric and Vinyl Coating)
The requirements of 326 IAC 8-2-11 are not applicable to this source, since this source does not perform surface coating of fabric or vinyl as defined by 326 IAC 8-2-11(a).

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.

326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source does not perform manufacturing of wood furniture.

Testing Requirements

This source is not required to perform stack testing because compliance with the particulate matter emission limits for the surface coating operations can be determined by compliance monitoring of the control devices and emissions calculations based on the solids content of the coatings which can be obtained from MSDS. Also, the woodworking operations are controlled by baghouses with controlled emissions significantly below the relevant allowable particulate matter emission rates.

Compliance Requirements

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

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

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

1. The travel trailer assembly and finishing operations, designated as EU-01 and EU-02 have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation when venting to the atmosphere. If a condition exists which should result in a response step, 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.

   (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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.

   These monitoring conditions are necessary because the dry filters for the trailer assembly and finishing operations, designated as EU-01 and EU-02 must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes).

2. The milling shops, designated as MS-01 and MS-02 have applicable compliance monitoring conditions as specified below:

   (a) Daily visible emission notations of the Millshops MS-01 and MS-02 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

   (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

   (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

   (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

   (e) 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.

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

(h) 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 line. 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.

These monitoring conditions are necessary because the dustcollectors for the milling shops, designated as MS-01 and MS-02 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this non-motorized travel trailer manufacturing plant shall be subject to the conditions of the FESOP 039-22971-00621.

Mail to: Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Heartland Recreational Vehicles, LLC Plant 2
1001 All Pro Drive
Elkhart, Indiana 46514

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Heartland Recreational Vehicles, LLC Plant 2, 1001 All Pro Drive , Elkhart, Indiana, 46514, completed construction of the one (1) travel trailer assembly and finishing operation, designated as EU-02 and one (1) woodworking operation, designated as Millshop MS-02 on _____in conformity with the requirements and intent of the permit application received by the Office of Air Quality on March 13, 2006 and as permitted pursuant to New Source Construction and Federally Enforceable State Operating Permit (FESOP) No. 039-22971, Plant ID No. 039-00621 issued on

Further Affiant said not.
I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature

Name (typed or printed)

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

Company Name: **Heartland Recreational Vehicles, LLC - Plant 2**
Address City IN Zip: **1001 All Pro Drive, Elkhart, IN 46514**
Permit Number: **FESOP 039-22971-00621**
Reviewer: **AB/ EVP**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-01																
Silkaflex 552 Adhesive	10.6	3.32%	0.0%	3.3%	0.0%	97.00%	1.18000	1.250	0.35	0.35	0.52	12.46	2.27	0.00	0.36	100%
502 Silicone Sealant Caulk	8.5	10.00%	0.0%	10.0%	0.0%	95.00%	0.74000	1.250	0.85	0.85	0.79	18.89	3.45	0.00	0.90	100%
8011 Latex Sealer Adhesive	8.5	10.24%	10.0%	0.2%	8.3%	92.00%	1.50000	1.250	0.02	0.02	0.04	0.92	0.17	0.00	0.02	100%
P1015 Low VOC Sealer	9.4	34.00%	0.0%	34.0%	0.0%	66.00%	0.25000	1.250	3.18	3.18	0.99	23.84	4.35	0.00	4.82	100%
Rust-Oleum 2402 Gloss Black	7.0	95.00%	0.0%	95.0%	0.0%	5.00%	0.11000	1.250	6.62	6.62	0.91	21.85	3.99	0.05	132.43	75%
EU-02																
Silkaflex 552 Adhesive	10.6	3.32%	0.0%	3.3%	0.0%	97.00%	1.18000	1.250	0.35	0.35	0.52	12.46	2.27	0.00	0.36	100%
502 Silicone Sealant Caulk	8.5	10.00%	0.0%	10.0%	0.0%	95.00%	0.74000	1.250	0.85	0.85	0.79	18.89	3.45	0.00	0.90	100%
8011 Latex Sealer Adhesive	8.5	10.24%	10.0%	0.2%	8.3%	92.00%	1.50000	1.250	0.02	0.02	0.04	0.92	0.17	0.00	0.02	100%
P1015 Low VOC Sealer	9.4	34.00%	0.0%	34.0%	0.0%	66.00%	0.25000	1.250	3.18	3.18	0.99	23.84	4.35	0.00	4.82	100%
Rust-Oleum 2402 Gloss Black	7.0	95.00%	0.0%	95.0%	0.0%	5.00%	0.11000	1.250	6.62	6.62	0.91	21.85	3.99	0.05	132.43	75%

State Potential Emissions **Add worst case coating to all solvents** **6.50** **155.92** **28.46** **0.10**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **Heartland Recreational Vehicles, LLC - Plant 2**
Address City IN Zip: **1001 All Pro Drive, Elkhart, IN 46514**
Permit Number: **FESOP 039-22971-00621**
Permit Reviewer: **AB/ EVP**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
EU-01									
Silkaflex 552 Adhesive	10.6	1.18000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
502 Silicone Sealant Caulk	8.5	0.74000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
8011 Latex Sealer Adhesive	8.5	1.50000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
P1015 Low VOC Sealer	9.4	0.25000	1.250	0.00%	34.00%	0.00%	0.00	4.35	0.00
Rust-Oleum 2402 Gloss Black	7.0	0.11000	1.250	10.00%	30.00%	5.00%	0.42	1.26	0.21
EU-02									
Silkaflex 552 Adhesive	10.6	1.18000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
502 Silicone Sealant Caulk	8.5	0.74000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
8011 Latex Sealer Adhesive	8.5	1.50000	1.250	0.00%	0.00%	0.00%	0.00	0.00	0.00
P1015 Low VOC Sealer	9.4	0.25000	1.250	0.00%	34.00%	0.00%	0.00	4.35	0.00
Rust-Oleum 2402 Gloss Black	7.0	0.11000	1.250	10.00%	30.00%	5.00%	0.42	1.26	0.21
Total State Potential Emissions							**0.84**	**11.22**	**0.42**

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: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Heaters

Company Name: **Heartland Recreational Vehicles, LLC - Plant 2**
Address City IN Zip: **1001 All Pro Drive, Elkhart, IN 46514**
Permit Number: **FESOP 039-22971-00621**
Reviewer: **AB/ EVP**

Two (2) 1.3 MMBtu/hr thermocyclers, two (2) 0.464 MMBtu/hr thermocyclers and four (4) 0.09 MMBtu/hr office heaters.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.9	34.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.03	0.13	0.01	1.70	0.09	1.43

*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 HAP emission calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Space Heaters
HAPs Emissions

Company Name: **Heartland Recreational Vehicles, LLC - Plant 2**
Address City IN Zip: **1001 All Pro Drive, Elkhart, IN 46514**
Permit Number: **FESOP 039-22971-00621**
Reviewer: **AB/ EVP**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.576E-05	2.044E-05	1.277E-03	3.065E-02	5.790E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.515E-06	1.873E-05	2.384E-05	6.471E-06	3.576E-05

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.

Appendix A: Process Particulate Emissions

Company Name: Heartland Recreational Vehicles, LLC - Plant 2
Address City IN Zip: 1001 All Pro drive, Elkhart, IN 46514
Permit No.: FESOP 039-22971-00621
Reviewer: AB/ EVP

Particulate Emissions Before Control (tons/year)			
Emission Unit	PM/PM10 Collection Rate (lb/hr)	PM/PM10 emissions (tons/yr)	Control Efficiency
MS-01	1.20	5.261	99.90%
MS-02	1.20	5.261	99.90%
Total =		**10.523**	

Particulate Emissions After Control (tons/year)		
Emission Unit	PM/PM10 Collection Rate (lb/hr)	PM/PM10 emissions (tons/yr)
MS-01	0.012	0.005
MS-02	0.012	0.005
Total =		**0.011**

Methodology:

MS-02 will operate similar to MS-01. MS-01 and MS-02 both have air flow rates of less than 4000 cfm. Therefore, the MS-01 PM/PM10 collection rate of 1.2 lb/hr with a control efficiency of 99.9% was used MS-02.

Uncontrolled Emissions:

Uncontrolled Emissions (tons/yr) = Particulate Emission Rate (lb/hr)* 8760 hr/yr * 1 ton/2,000 lbs * 1/Control Efficiency
Uncontrolled emission rate based on particulate collected by the baghouses.

Controlled Emissions :

Controlled Emissions (lb/hr) = PM/PM10 Collection Rate (lb/hr)* 1/ Control Efficiency * (1-Control Efficiency)
Controlled emission rate based on particulate emitted after the dust collector.
Controlled Emissions (tons/yr) = Uncontrolled Particulate Emission Rate (tons/yr)* (1-Control Efficiency)