



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 30, 2007
RE: Liberty Homes, Inc. / 085-23008-00043
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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Indianapolis, Indiana 46204-2251
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Liberty Homes, Inc.
203 South Huntington Street
Syracuse, Indiana 46567**

(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.

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|---|--|
| Operation Permit No.: F085-23008-00043 | |
| Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: January 26, 2007 Expiration Date: January 26, 2012 |



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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 modular home manufacturing facility.

| | |
|------------------------------|---|
| Authorized Individual: | Michael Nordin |
| Source Address: | 203 South Huntington Street, Syracuse, Indiana 46567 |
| Mailing Address: | P.O. Box 308, Syracuse, Indiana 46567 |
| General Source Phone Number: | 574-457-3121 |
| SIC Code: | 2451 |
| County Location: | Kosciusko |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source, under PSD and Emission Offset Rules 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) Frame and Floor Fabrication Unit, identified as FFF, constructed March 1, 1958, controlled by dry filters, consisting of the following:
 - (1) One (1) HVLP spray gun for applying paint to the metal frames.
 - (2) Hand applicators to apply floor sealer and glue to the wooden floor and metal frame.
- (b) One (1) Wall and Cabinet Fabrication Unit, identified as WCF, constructed March 1, 1958, consisting of the following:
 - (1) Woodworking operations controlled by two (2) cyclone dust collectors, identified as P1 and P2.
 - (2) Three (3) HVLP spray guns, controlled by dry filters, for applying adhesives and vapor barrier to the walls and cabinets.
 - (3) Hand applicators to apply miscellaneous glues, sealers, and insulation to the walls and cabinets.
- (c) One (1) Roof Fabrication Unit, identified as RF, constructed March 1, 1958, consisting of hand applicators for applying roof cement, roof sealant, and foam sealer.
- (d) One (1) Final Finish and Assembly Unit, identified as FFA, constructed March 1, 1958, consisting of the following:
 - (1) Hand held aerosol (airless) applicators to apply paint to the finished modular homes.

- (2) Hand applicators to apply adhesives, cleaners and caulk to the finished modular homes.

All HVLP, hand, and aerosol processes exhaust into the interior of the building. The building is exhausted to the outside with a 4,000 scfm wall fan, identified as V1.

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 units with heat input equal to or less than ten (10) million Btu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs:
 - (1) Welding operations, located in area FFF, with PM-10 emission less than twenty-five (25) pounds per day:
 - (A) Six (6) stick welders, identified as W1 - W6.
 - (B) Three (3) oxyacetylene torches, identified as T1 - T3.
- (f) Emission units with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, and lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day:
 - (1) One (1) foam pump, identified as FP1.
 - (2) Miscellaneous woodworking equipment located in areas FFF, RF, and FFA.
- (g) Activities and categories of activities with individual HAP emissions not previously identified. Any unit with potential, uncontrolled emissions greater than one (1) pound per day but less than five (5) pound per day or one (1) ton per year of a single HAP.
 - (1) 4, 4' Methylendiphenyl Diisocyanate (MDI) used in polymerization reactions to produce foam insulation. The MDI emissions from this activity are calculated to be 2.5×10^{-6} pounds per hour (0.022 pounds per year).

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) to renew 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 Permit Term [326 IAC 2-8-4(2)]

- (a) This permit, F085-23008-00043, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

B.5 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.6 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.7 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. 8 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.9 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.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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.12 Emergency Provisions [326 IAC 2-8-12]

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

Northern Regional Office
Telephone No.: 1-800-753-5519, or
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 085-23008-00043 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.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

- (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 needed to process the application.

B.18 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 should be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases in emissions at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 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.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a 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.22 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 2-8-11(b)(3)]

B.23 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) 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.

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. 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 Data Section, 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 certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions 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 the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

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 source 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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 [326 IAC 2-8-4(10)]:

- (a) One (1) Frame and Floor Fabrication Unit, identified as FFF, constructed March 1, 1958, controlled by dry filters, consisting of the following:
 - (1) One (1) HVLP spray gun for applying paint to the metal frames.
 - (2) Hand applicators to apply floor sealer and glue to the wooden floor and metal frame.
- (b) One (1) Wall and Cabinet Fabrication Unit, identified as WCF, constructed March 1, 1958, consisting of the following:
 - (1) Woodworking operations controlled by two (2) cyclone dust collectors, identified as P1 and P2.
 - (2) Three (3) HVLP spray guns, controlled by dry filters, for applying adhesives and vapor barrier to the walls and cabinets.
 - (3) Hand applicators to apply miscellaneous glues, sealers, and insulation to the walls and cabinets.
- (c) One (1) Roof Fabrication Unit, identified as RF, constructed March 1, 1958, consisting of hand applicators for applying roof cement, roof sealant, and foam sealer.
- (d) One (1) Final Finish and Assembly Unit, identified as FFA, constructed March 1, 1958, consisting of the following:
 - (1) Hand held aerosol (airless) applicators to apply paint to the finished modular homes.
 - (2) Hand applicators to apply adhesives, cleaners and caulk to the finished modular homes.

All HVLP, hand, and aerosol processes exhaust into the interior of the building. The building is exhausted to the outside with a 4,000 scfm wall fan, identified as V1.

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

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

D.1.1 Hazardous Air Pollutants [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single HAP delivered to the applicator plus the amount of any single HAP used for clean-up shall be less than 10 tons per twelve (12) consecutive month period.
- (b) The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be less than 25 tons per twelve (12) consecutive month period.

D.1.2 Particulate [326 IAC 6-3-2(d)]

Particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.3 Particulate Matter (PM) from woodworking operations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the woodworking operations shall not exceed 4.37 pounds per hour when operating at a process weight rate of 2,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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 these facilities and any control devices.

Compliance Determination Requirements

D.1.5 HAPs Emissions

Compliance with Conditions D.1.1 shall be demonstrated within 30 days of the end of each month based on the total HAPs usage for the most recent twelve (12) month period.

D.1.6 Particulate Matter (PM)

The cyclones for PM control shall be in operation at all times when the woodworking equipment is in operation.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To document compliance with Condition D.1.2, observations shall be made daily of the overspray while one or more of the spray guns is in operation. 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 the specific process. 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.

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the woodworking stack exhaust shall be performed once per day 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 and Exceedances, shall be considered a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

D.1.9 Cyclone Inspections

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

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs limits established in Condition D.1.1.
 - (1) The amount and the HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total HAPs (both single and combined HAPs) emitted each month; and
 - (4) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.
- (c) To document compliance with Condition D.1.8, the Permittee shall keep records of daily visible emissions notations.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Liberty Homes, Inc.
Source Address: 203 South Huntington Street, Syracuse, Indiana 46567
Mailing Address: P.O. Box 308, Syracuse, Indiana 46567
FESOP No.: F 085-23008-00043

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: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Liberty Homes, Inc.
Source Address: 203 South Huntington Street, Syracuse, Indiana 46567
Mailing Address: P.O. Box 308, Syracuse, Indiana 46567
FESOP No.: F 085-23008-00043

This form consists of 2 pages

Page 1 of 2

9 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 317-233-0178, ask for Compliance Section); and
☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), 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: Liberty Homes, Inc.
 Source Address: 203 South Huntington Street, Syracuse, Indiana 46567
 Mailing Address: P.O. Box 308, Syracuse, Indiana 46567
 FESOP No.: F 085-23008-00043
 Facility: Frame and Floor Fabrication Unit (FFF), Wall and Cabinet Fabrication Unit (WCF),
 Roof Fabrication Unit (RF), and Final Finish and Assembly Unit (FFA).
 Parameter: HAP – Ethylene Glycol
 Limit: Less than 10 tons per 12 consecutive month period for any single HAP delivered to
 the entire source.

Quarter _____

YEAR:

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

- ☛ No deviation occurred in this quarter.
- ☛ Deviation/s occurred in this quarter.
 Deviation has been reported on:

| |
|-----------------|
| Submitted by: |
| Title/Position: |
| Signature: |
| Date: |
| Phone: |

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Liberty Homes, Inc.
 Source Address: 203 South Huntington Street, Syracuse, Indiana 46567
 Mailing Address: P.O. Box 308, Syracuse, Indiana 46567
 FESOP No.: F 085-23008-00043
 Facility: Frame and Floor Fabrication Unit (FFF), Wall and Cabinet Fabrication Unit (WCF),
 Roof Fabrication Unit (RF), and Final Finish and Assembly Unit (FFA).
 Parameter: Total HAPs
 Limit: Less than 25 tons per 12 consecutive month period for combination of HAPs
 delivered to the entire source.

Quarter _____

YEAR:

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

- ☛ No deviation occurred in this quarter.
- ☛ Deviation/s occurred in this quarter.
 Deviation has been reported on:

| |
|-----------------|
| Submitted by: |
| Title/Position: |
| Signature: |
| Date: |
| Phone: |

Attach a signed certification to complete this report.

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

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

Source Name: Liberty Homes, Inc.
Source Address: 203 South Huntington Street, Syracuse, Indiana 46567
Mailing Address: P.O. Box 308, Syracuse, Indiana 46567
FESOP No.: F 085-23008-00043

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|---|--------------------------------------|
| <p>This report is an affirmation that the source has met all the requirements stated in this permit. 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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".</p> | |
| <p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p> | |
| <p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Form Completed by: | |
| Title/Position: | |
| Date: | |
| Phone: | |

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Federally Enforceable Operating
Permit (FESOP) Renewal**

Source Background and Description

| | |
|--|--|
| Source Name: | Liberty Homes, Inc. |
| Source Location: | 203 S. Huntington Street, Syracuse, Indiana 46567 |
| County: | Kosciusko |
| SIC Code: | 2451 |
| Operation Permit No.: | F085-15189-00043 |
| Operation Permit Issuance Date: | March 7, 2002 |
| Permit Renewal No.: | F085-23008-00043 |
| Permit Reviewer: | Janet Mobley |

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Liberty Homes, Inc. relating to the operation of a modular home manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Frame and Floor Fabrication Unit, identified as FFF, constructed March 1, 1958, controlled by dry filters, consisting of the following:
 - (1) One (1) HVLP spray gun for applying paint to the metal frames.
 - (2) Hand applicators to apply floor sealer and glue to the wooden floor and metal frame.
- (b) One (1) Wall and Cabinet Fabrication Unit, identified as WCF, constructed March 1, 1958, consisting of the following:
 - (1) Woodworking operations controlled by two (2) cyclone dust collectors, identified as P1 and P2.
 - (2) Three (3) HVLP spray guns, controlled by dry filters, for applying adhesives and vapor barrier to the walls and cabinets.
 - (3) Hand applicators to apply miscellaneous glues, sealers, and insulation to the walls and cabinets.
- (c) One (1) Roof Fabrication Unit, identified as RF, constructed March 1, 1958, consisting of hand applicators for applying roof cement, roof sealant, and foam sealer.
- (d) One (1) Final Finish and Assembly Unit, identified as FFA, constructed March 1, 1958, consisting of the following:

- (1) Hand held aerosol (airless) applicators to apply paint to the finished modular homes.
- (2) Hand applicators to apply adhesives, cleaners and caulk to the finished modular homes.

All HVLP, hand, and aerosol processes exhaust into the interior of the building. The building is exhausted to the outside with a 4,000 scfm wall fan, identified as V1.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion units with heat input equal to or less than ten (10) million Btu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs:
 - (1) Welding operations, located in area FFF, with PM-10 emission less than twenty-five (25) pounds per day:
 - (A) Six (6) stick welders, identified as W1 - W6.
 - (B) Three (3) oxyacetylene torches, identified as T1 - T3.
- (f) Emission units with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, and lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundreds (3.29) pounds per day:
 - (1) One (1) foam pump, identified as FP1.
 - (2) Miscellaneous woodworking equipment located in areas FFF, RF, and FFA.
- (g) Activities and categories of activities with individual HAP emissions not previously identified. Any unit with potential, uncontrolled emissions greater than one (1) pound per day but less than five (5) pound per day or one (1) ton per year of a single HAP.
 - (1) 4, 4' Methylendiphenyl Diisocyanate (MDI) used in polymerization reactions to produce foam insulation. The MDI emissions from this activity are calculated to be 2.5×10^{-6} pounds per hour (0.022 pounds per year).

Existing Approvals

The source has been operating under the previous FESOP 085-15189-00043 issued on March 7, 2002, with an expiration date of March 7, 2007.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application received April 25, 2006, and additional information submitted by the applicant.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1 through 9).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

| Pollutant | Unrestricted Potential Emissions (tons/yr) |
|-----------------|--|
| PM | 52.33 |
| PM-10 | 52.33 |
| SO ₂ | -- |
| VOC | 66.99 |
| CO | -- |
| NO _x | -- |

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

| HAP's | Unrestricted Potential Emissions (tons/yr) |
|--------------------|--|
| Vinyl Acetate | 0.07 |
| Glycol Ethers | 0.18 |
| Hexane | 4.52 |
| Toluene | 0.75 |
| Ethyene Glycol | 32.54 |
| Methylene Chloride | 2.93 |
| Xylene | 1.12 |
| TOTAL | 42.12 |

- (a) Emission of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. The source has opted to remain a FESOP source, therefore, the source emissions will be limited to below the Title V levels.

- (c) **Fugitive Emissions**
 Pursuant to 326 IAC 2-7-2(e) all fugitive emissions are counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F085-7685-00043; issued on August 15, 1997).

| Process/emission unit | Potential to Emit (tons/year) | | | | | | |
|---|-------------------------------|--------------|-----------------|--------------|-----------|-----------------|---|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Frame and Floor Fabrication Unit (FFF) | 2.35 | 2.35 | -- | 0.60 | -- | -- | Less than 10 for single HAP and 25 for combination HAPs |
| Wall and Cabinet Fabrication Unit (WCF) | 42.24 | 42.24 | -- | 42.24 | -- | -- | |
| Roof Fabrication Unit (RF) | -- | -- | -- | 14.30 | -- | -- | |
| Final Finish and Assembly Unit (FFA) | 0.11 | 0.11 | -- | 9.85 | -- | -- | |
| Total PTE After Issuance | 44.70 | 44.70 | -- | 66.99 | -- | -- | Less than 10 for single HAP and 25 for combination HAPs |

County Attainment Status

The source is located in Kosciusko County.

| Pollutant | Status |
|-------------------|------------|
| PM _{2.5} | attainment |
| PM ₁₀ | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| 8-Hour Ozone | attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x 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.
- (b) Kosciusko County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (c) Kosciusko County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Source Status

Existing Source, PSD and 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 | 44.70 |
| PM ₁₀ | 44.70 |
| SO ₂ | -- |
| VOC | 66.99 |
| CO | -- |
| NO _x | -- |
| Single HAP | <10 |
| Combination HAPs | <25 |

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The woodworking operation is not subject to the National Emission Standards for Hazardous Air Pollutant, 326 IAC 20, (40 CFR 63.800, Subpart JJ- National Emission Standards for Wood Furniture Manufacturing Operations). The source has taken a limit of less than 10 for single HAP and 25 for combination HAP, therefore the source is not considered a major source of HAPs. The source's SIC code is not under the wood furniture and wood furniture component definition, 40 CFR 63.801(a). Therefore the requirements of 40 CFR, Subpart JJ are not included in this permit.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

The potential HAP emissions from the entire source is more than 10 tons per year for a single HAP and 25 tons per year for a combination of HAPs. Pursuant to 326 IAC 2-8-4, the hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single HAP delivered to the applicator plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period.
- (b) The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be less than 25 tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 8-2 (Surface Coating Emission Limitations)

All the facilities in this source were constructed before January 1, 1980 and are located in Kosciusko county. Therefore, rule 326 IAC 8-2 does not apply to this facility.

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

All the facilities in this source were constructed before January 1, 1980. Therefore, rule 326 IAC 8-1-6 does not apply to this facility.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Since the source has been in operation before October 7, 1974, and the potential emissions of VOC are less than 100 tons per year, 326 IAC 8-6 does not apply.

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). These revisions have been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the requirement from the previous version of 326 IAC 6-3 (Process Operations) is no longer an applicable requirement. Sources subject to 326 IAC 6-3-2(d) are not subject to 326 IAC 6-3-2(e). Pursuant to 326 IAC 6-3-2(d) particulate from the surface coating shall be controlled by a dry particulate filter 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)

The allowable PM emission rate from the woodworking operations shall be limited to 4.37 pounds per hour when operating at a maximum process weight rate of 2,200 pounds per hour.

This limitation is based on the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

In order to meet the emission limit of 4.37 lbs/hr, the cyclones shall be in operation at all times the woodworking equipment is in operation.

Testing Requirements

No testing requirements exist in this FESOP, since the HAPs compliance methods are based on mass balance and recordkeeping. Testing of PM from woodworking is not required as the margin of compliance is large.

Compliance Requirements

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

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

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

1. (a) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone

inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

- (b) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These conditions are necessary because the cyclones for the woodworking process must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

- 2. Daily visible emissions notations of the stack exhaust from the woodworking operations shall be performed at least during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. When an abnormal emission is observed, the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions and Exceedances.

This condition is necessary to ensure the woodworking operations are in compliance with 326 IAC 6-3 (Particulate Emission Limitations).

- 3. The surface coating operations (all units) have the applicable monitoring condition as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. 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. Whenever a condition exists which should result in a response step; and
 - (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 system coating operations must be in compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this modular home manufacturing facility shall be subject to the conditions of the FESOP 085-23008-00043.

Appendix A: Emission Summary

Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
Permit NO: F085-23008-00043
Reviewer: Janet Mobley
Date: November 27, 2006

Uncontrolled Emissions

| Emission Units | PM | PM₁₀ | SO₂ | VOC | CO | NOx | HAPs |
|--|--------------|------------------------|-----------------------|--------------|-----------|------------|--------------|
| Frame & Floor Fabrication Unit (FFF) | 2.35 | 2.35 | | 0.6 | | | 0.04 |
| Coating Process of Wall & Cabinet Fabrication Unit (WCF) | 40.89 | 40.89 | | 42.24 | | | 38.10 |
| Woodworking Process of Wall & Cabinet Fabrication Unit (WCF) | 8.98 | 8.98 | | | | | |
| Roof Fabrication Unit (RF) | | | | 14.3 | | | |
| Final Finish & Assembly Unit (FFA) | 0.11 | 0.11 | | 9.85 | | | 3.98 |
| Total | 52.33 | 52.33 | | 66.99 | | | 42.12 |

Controlled Emissions

| Emission Units | PM | PM₁₀ | SO₂ | VOC | CO | NOx | HAPs |
|--|-------------|------------------------|-----------------------|--------------|-----------|------------|--------------|
| Frame & Floor Fabrication Unit (FFF) | 2.35 | 2.35 | | 0.6 | | | 0.04 |
| Coating Process of Wall & Cabinet Fabrication Unit (WCF) | 40.89 | 40.89 | | 42.24 | | | 38.10 |
| Woodworking Process of Wall & Cabinet Fabrication Unit (WCF) | 1.35 | 1.35 | | | | | |
| Roof Fabrication Unit (RF) | | | | 14.3 | | | |
| Final Finish & Assembly Unit (FFA) | 0.11 | 0.11 | | 9.85 | | | 3.98 |
| Total | 44.7 | 44.7 | | 66.99 | | | 42.12 |

**Appendix A: Emissions Calculations
VOC and Particulate
From the Frame and Floor Fabrication Unit (FFF)**

**Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: June 23, 2006**

| Material | Density (Lb/Gal) | Weight % Volatile (H ₂ O & 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 | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | PM Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--------------|------------------|---|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|----------------------------------|------------------------|-------------------------|-------------------------|-----------------------|-------------------|---------------------|
| Frame Paint | 8.59 | 75.00% | 72.0% | 3.0% | 74.0% | 22.00% | 0.574 | 0.87 | 0.26 | 0.13 | 3.09 | 0.56 | 2.35 | 1.17 | 50% |
| Floor Sealer | 8.76 | 45.00% | 45.0% | 0.0% | 50.0% | 50.00% | 0.364 | 0.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Glue | 9.10 | 60.10% | 60.0% | 0.1% | 65.0% | 35.00% | 1.035 | 0.87 | 0.01 | 0.01 | 0.20 | 0.04 | 0.00 | 0.03 | 100% |

| | | | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|--|--|---------------|-------------|-------------|-------------|-------------|--|--|
| Potential Emissions | | | | | | | | | | | | VOC | PM | | |
| | | | | | | | | | Totals | 0.14 | 3.29 | 0.60 | 2.35 | | |

METHODOLOGY

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

**Appendix A: Emissions Calculations
HAPs
From the Frame and Floor Fabrication Unit (FFF)**

**Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: June 23, 2006**

| Material | Density (Lb/Gal) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Weight % Vinyl Acetate | Vinyl Acetate Emissions (tons/yr) | Weight % Glycol Ethers | Glycol Ethers Emissions (tons/yr) | Weight % Hexane | Hexane Emissions (tons/yr) | Weight % Toluene | Toluene Emissions (tons/yr) | Weight % Ethylene Glycol | Ethylene Glycol Emissions (tons/yr) | Weight % Methylene Chloride | Methylene Chloride Emissions (tons/yr) | Weight % Xylene | Xylene Emissions (tons/yr) |
|--------------|------------------|------------------------|---------------------|------------------------|-----------------------------------|------------------------|-----------------------------------|-----------------|----------------------------|------------------|-----------------------------|--------------------------|-------------------------------------|-----------------------------|--|-----------------|----------------------------|
| Frame Paint | 8.59 | 0.574 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Floor Sealer | 8.76 | 0.364 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Glue | 9.10 | 1.035 | 0.87 | 0.10% | 0.04 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |

| | | | | | | | | | | | | | | | | | |
|---|--|--|--|--|----------------------|--|----------------------|--|---------------|--|----------------|--|------------------------|--|---------------------------|--|---------------|
| | | | | | Vinyl Acetate | | Glycol Ethers | | Hexane | | Toluene | | Ethylene Glycol | | Methylene Chloride | | Xylene |
| Total Potential Emissions (Single HAP) | | | | | 0.04 | | 0.00 | | 0.00 | | 0.00 | | 0.00 | | 0.00 | | 0.00 |
| Total Combination of HAPs | | | | | 0.04 | | | | | | | | | | | | |

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate**

From the Coating Process of the Wall and Cabinet Fabrication Unit (WCF)

**Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: June 23, 2006**

| Material | Density (Lb/Gal) | Weight % Volatile (H ₂ O & 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 | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | PM Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|----------------|------------------|---|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|----------------------------------|------------------------|-------------------------|-------------------------|-----------------------|-------------------|---------------------|
| Ever Foam | 10.01 | 54.80% | 25.0% | 29.8% | 22.0% | 47.0% | 0.356 | 0.87 | 2.98 | 0.92 | 22.17 | 4.05 | 0.00 | 6.35 | 100% |
| MH9000 | 8.82 | 36.40% | 1.4% | 35.0% | 1.9% | 46.2% | 0.448 | 0.87 | 3.09 | 1.20 | 28.88 | 5.27 | 0.00 | 6.68 | 100% |
| Glue | 9.10 | 60.10% | 60.0% | 0.1% | 65.0% | 35.0% | 1.035 | 0.87 | 0.01 | 0.01 | 0.20 | 0.04 | 0.00 | 0.03 | 100% |
| Stix 309 | 8.00 | 40.50% | 40.0% | 0.5% | 38.0% | 62.0% | 0.421 | 0.87 | 0.04 | 0.01 | 0.35 | 0.06 | 3.82 | 0.06 | 50% |
| Vapor Barrier | 10.01 | 30.50% | 0.0% | 30.5% | 0.0% | 65.0% | 2.797 | 0.87 | 3.05 | 7.43 | 178.30 | 32.54 | 37.07 | 4.70 | 50% |
| Silicone | 6.67 | 5.00% | 0.0% | 5.0% | 0.0% | 93.0% | 0.225 | 0.87 | 0.33 | 0.07 | 1.57 | 0.29 | 0.00 | 0.36 | 100% |
| Joint Compound | 10.30 | 20.20% | 20.2% | 0.0% | 25.0% | 75.0% | 2.900 | 0.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |

| | | | | | |
|----------------------------|---------------|-------------|---------------|----------------------|---------------------|
| Potential Emissions | Totals | 9.64 | 231.47 | VOC 42.24 | PM 40.89 |
|----------------------------|---------------|-------------|---------------|----------------------|---------------------|

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

HAPs

From the Coating Process of the Wall and Cabinet Fabrication Unit (WCF)

Company Name: Liberty Homes, Inc.

Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567

FESOP: F085-23008-00043

Reviewer: Janet Mobley

Date: May 10, 2006

| Material | Density (Lb/Gal) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Weight % Vinyl Acetate | Vinyl Acetate Emissions (tons/yr) | Weight % Glycol Ethers | Glycol Ethers Emissions (tons/yr) | Weight % Hexane | Hexane Emissions (tons/yr) | Weight % Toluene | Toluene Emissions (tons/yr) | Weight % Ethylene Glycol | Ethylene Glycol Emissions (tons/yr) | Weight % Methylene Chloride | Methylene Chloride Emissions (tons/yr) | Weight % Xylene | Xylene Emissions (tons/yr) |
|----------------|------------------|------------------------|---------------------|------------------------|-----------------------------------|------------------------|-----------------------------------|-----------------|----------------------------|------------------|-----------------------------|--------------------------|-------------------------------------|-----------------------------|--|-----------------|----------------------------|
| Ever Foam | 10.01 | 0.356 | 0.87 | 0.00% | 0.00 | 1.30% | 0.18 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.50% | 0.07 | 0.00% | 0.00 |
| MH9000 | 8.82 | 0.448 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 30.00% | 4.52 | 5.00% | 0.75 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Glue | 9.10 | 1.035 | 0.87 | 0.10% | 0.04 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Stix 309 | 8.00 | 0.421 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Vapor Barrier | 10.01 | 2.797 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 30.50% | 32.54 | 0.00% | 0.00 | 0.00% | 0.00 |
| Silicone | 6.67 | 0.225 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Joint Compound | 10.30 | 2.900 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |

| | | | | | | | | | | | |
|---|--|--|--|--|----------------------|----------------------|---------------|----------------|------------------------|---------------------------|---------------|
| | | | | | Vinyl Acetate | Glycol Ethers | Hexane | Toluene | Ethylene Glycol | Methylene Chloride | Xylene |
| Total Potential Emissions (Single HAP) | | | | | 0.04 | 0.18 | 4.52 | 0.75 | 32.54 | 0.07 | 0.00 |
| Total Combination of HAPs | | | | | 38.10 | | | | | | |

METHODOLOGY

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

Appendix A: Emissions Calculations

Particulate Emissions

From the woodworking process of the Wall and Cabinet Fabrication Unit (WCF)

Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: May 10, 2006

Woodworking Process PM Control for Cyclone P#1

Throughput of Wood: 2200 lbs/hr
PM Control Equipment: Dust Collector - Cyclone
Grain Loading: 0.003 grains/acf
Air Flow Rate: 6000 acf/m
Control Efficiency: 85.00%

After Control Emissions:

Hourly PM Emissions = $0.003 \text{ gr/acf} \times 6000 \text{ acf/min} \times 60 \text{ min/hr} \times 1/(7000 \text{ lb/gr}) = \mathbf{0.154 \text{ lbs/hr}}$
Annual PM emissions = $0.154 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1/2000 \text{ (ton/lb)} = \mathbf{0.674 \text{ tons/yr}}$

Before Control Emissions:

Uncontrolled Potential PM emissions = $0.674 \text{ tons/yr} / (1-85\%) = \mathbf{4.49 \text{ tons/yr}}$

Woodworking Process PM Control for Cyclone P#2

Throughput of Wood: 2200 lbs/hr
PM Control Equipment: Dust Collector - Cyclone
Grain Loading: 0.003 grains/acf
Air Flow Rate: 6000 acf/m
Control Efficiency: 85.00%

After Control Emissions:

Hourly PM Emissions = $0.003 \text{ gr/acf} \times 6000 \text{ acf/min} \times 60 \text{ min/hr} \times 1/(7000 \text{ lb/gr}) = \mathbf{0.154 \text{ lbs/hr}}$
Annual PM emissions = $0.154 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1/2000 \text{ (ton/lb)} = \mathbf{0.674 \text{ tons/yr}}$

Before Control Emissions:

Uncontrolled Potential PM emissions = $0.674 \text{ tons/yr} / (1-85\%) = \mathbf{4.49 \text{ tons/yr}}$

**Appendix A: Emissions Calculations
VOC and Particulate
From the Roof Fabrication Unit (RF)**

**Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: May 10, 2006**

| Material | Density (Lb/Gal) | Weight % Volatile (H ₂ O & 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 | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | PM Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--------------|------------------|---|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|----------------------------------|------------------------|-------------------------|-------------------------|-----------------------|-------------------|---------------------|
| Roof Cement | 8.34 | 23.70% | 0.0% | 23.7% | 0.0% | 70.0% | 1.720 | 0.87 | 1.98 | 2.96 | 70.99 | 12.95 | 0.00 | 2.82 | 100% |
| Roof Sealant | 8.34 | 23.70% | 0.0% | 23.7% | 0.0% | 70.0% | 0.178 | 0.87 | 1.98 | 0.31 | 7.35 | 1.34 | 0.00 | 2.82 | 100% |
| Foam Seal | 9.51 | 0.00% | 0.0% | 0.0% | 0.0% | 100.0% | 2.400 | 0.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |

| | | | | | |
|----------------------------|---------------|-------------|--------------|----------------------|--------------------|
| Potential Emissions | Totals | 3.26 | 78.33 | VOC 14.30 | PM 0.00 |
|----------------------------|---------------|-------------|--------------|----------------------|--------------------|

METHODOLOGY

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

Appendix A: Emissions Calculations Page 8 of 10 TSD App A
HAPs
From the Roof Fabrication Unit (RF)

Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: May 10, 2006

| Material | Density (Lb/Gal) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Weight % Vinyl Acetate | Vinyl Acetate Emissions (tons/yr) | Weight % Glycol Ethers | Glycol Ethers Emissions (tons/yr) | Weight % Hexane | Hexane Emissions (tons/yr) | Weight % Toluene | Toluene Emissions (tons/yr) | Weight % Ethylene Glycol | Ethylene Glycol Emissions (tons/yr) | Weight % Methylene Chloride | Methylene Chloride Emissions (tons/yr) | Weight % Xylene | Xylene Emissions (tons/yr) |
|--------------|------------------|------------------------|---------------------|------------------------|-----------------------------------|------------------------|-----------------------------------|-----------------|----------------------------|------------------|-----------------------------|--------------------------|-------------------------------------|-----------------------------|--|-----------------|----------------------------|
| Roof Cement | 8.34 | 1.720 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Roof Sealant | 8.34 | 0.178 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Foam Seal | 9.51 | 2.400 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |

| | | | | | | | | | | | | | | | | | |
|---|--|--|--|--|----------------------|--|----------------------|--|---------------|--|----------------|--|------------------------|--|---------------------------|--|---------------|
| | | | | | Vinyl Acetate | | Glycol Ethers | | Hexane | | Toluene | | Ethylene Glycol | | Methylene Chloride | | Xylene |
| Total Potential Emissions (Single HAP) | | | | | 0.00 | | 0.00 | | 0.00 | | 0.00 | | 0.00 | | 0.00 | | 0.00 |
| Total Combination of HAPs | | | | | 0.00 | | | | | | | | | | | | |

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From the Final finish and Assembly Unit (FFA)**

**Company Name: Liberty Homes, Inc.
Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567
FESOP: F085-23008-00043
Reviewer: Janet Mobley
Date: May 10, 2006**

| Material | Density (Lb/Gal) | Weight % Volatile (H ₂ O & 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 | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | PM Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|----------|------------------|---|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|----------------------------------|------------------------|-------------------------|-------------------------|-----------------------|-------------------|---------------------|
| Adhesive | 7.09 | 70.00% | 0.0% | 70.0% | 0.0% | 20.8% | 0.200 | 0.87 | 4.96 | 0.86 | 20.73 | 3.78 | 0.00 | 23.86 | 100% |
| Cleaner | 6.61 | 100.00% | 10.0% | 90.0% | 10.0% | 0.0% | 0.154 | 0.87 | 5.95 | 0.80 | 19.13 | 3.49 | 0.00 | - | 100% |
| Paint | 7.80 | 95.00% | 63.0% | 32.0% | 45.0% | 8.0% | 0.153 | 0.87 | 2.50 | 0.33 | 7.97 | 1.46 | 0.11 | 31.20 | 50% |
| Caulk | 8.17 | 40.00% | 0.0% | 40.0% | 0.0% | 75.0% | 0.090 | 0.87 | 3.27 | 0.26 | 6.14 | 1.12 | 0.00 | 4.36 | 100% |

| | | | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|--|--|---------------|-------------|--------------|-------------|-------------|--|--|
| Potential Emissions | | | | | | | | | | | | VOC | PM | | |
| | | | | | | | | | Totals | 2.25 | 53.97 | 9.85 | 0.11 | | |

METHODOLOGY

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

Appendix A: Emissions Calculations Page 10 of 10 TSD

HAPs

From the Final Finish and Assembly Unit (FFA)

Company Name: Liberty Homes, Inc.

Address City IN Zip: 203 S. Huntington Street, Syracuse, IN 46567

FESOP: F085-23008-00043

Reviewer: Janet Mobley

Date: May 10, 2006

| Material | Density (Lb/Gal) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Weight % Vinyl Acetate | Vinyl Acetate Emissions (tons/yr) | Weight % Glycol Ethers | Glycol Ethers Emissions (tons/yr) | Weight % Hexane | Hexane Emissions (tons/yr) | Weight % Toluene | Toluene Emissions (tons/yr) | Weight % Ethylene Glycol | Ethylene Glycol Emissions (tons/yr) | Weight % Methylene Chloride | Methylene Chloride Emissions (tons/yr) | Weight % Xylene | Xylene Emissions (tons/yr) |
|----------|------------------|------------------------|---------------------|------------------------|-----------------------------------|------------------------|-----------------------------------|-----------------|----------------------------|------------------|-----------------------------|--------------------------|-------------------------------------|-----------------------------|--|-----------------|----------------------------|
| Adhesive | 7.09 | 0.200 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Cleaner | 6.61 | 0.154 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 |
| Paint | 7.80 | 0.153 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 63.00% | 2.86 | 0.00% | 0.00 |
| Caulk | 8.17 | 0.090 | 0.87 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 0.00% | 0.00 | 40.00% | 1.12 |

| | Vinyl Acetate | Glycol Ethers | Hexane | Toluene | Ethylene Glycol | Methylene Chloride | Xylene |
|---|---------------|---------------|-------------|-------------|-----------------|--------------------|-------------|
| Total Potential Emissions (Single HAP) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.86 | 1.12 |
| Total Combination of HAPs | 3.98 | | | | | | |

METHODOLOGY

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