



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: March 27, 2007
RE: Rochester Homes, Inc. / 049-23509-00026
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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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Rochester Homes, Inc.
1345 North Lucas Street
Rochester, Indiana 46975

(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.

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

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

Operation Permit No.: MSOP 049-23509-00026	
Issued by: Original document signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 27, 2007 Expiration Date: March 27, 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.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary modular homes manufacturing source.

Source Address:	1345 North Lucas Street, Rochester, IN 46975
Mailing Address:	1345 North Lucas Street, Rochester, IN 46975
General Source Phone Number:	(574) 224-7323
SIC Code:	2451
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source operating Permit Program
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) final finish department, using one (1) airless atomization spray gun, along with hand or roller type applications, with a maximum capacity of 0.375 units per hour. The emissions from the operation are emitted near an area inside the building under ceiling vent D.
- (b) One (1) woodworking operation, with a maximum capacity of 2,000 pounds per hour, controlled by a cyclone, exhausting at stack E.
- (c) Two (2) departments for floor, partition, side wall and plumbing, using hand or roller surface coating type applications, each with a maximum capacity of 0.375 units per hour. The emissions from the operations are emitted near areas inside the building under ceiling vents A and B.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (e) Paved and unpaved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, MSOP 049-23509-00026, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the

PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to MSOP 049-23509-00026 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revision are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

B.15 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at 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 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 substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the

property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring

sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

Reports required in this part shall be submitted to:

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) final finish department, using one (1) airless atomization spray gun, along with hand or roller type applications, with a maximum capacity of 0.375 units per hour. The emissions from the operation are emitted near an area inside the building under ceiling vent D.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the particulate emitted from the spray-gun surface coating operation (final finish department) shall operate with the equivalent control method (work practices) which includes:

- (a) Operate the coating operation inside the building.
- (b) Spray coat only the interior of the homes being manufactured.
- (c) Proper work practices as follows:
- (1) Spray no farther than 18" from the coating surface.
 - (2) Spray gun pressure shall be maintained at 40 pounds per square inch (psi) or less.
 - (3) The source shall use guns with nozzle size no greater than 0.017".

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray-gun surface coating operations (final finish department).

SECTION D.2

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) woodworking operation, with a maximum capacity of 2,000 pounds per hour, controlled by a cyclone, exhausting at stack E.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the woodworking operations shall not exceed 4.10 pounds per hour or less when operating at a maximum process weight rate of 2,000 pounds per hour.

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking operations and any control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1, the cyclone for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

Compliance Monitoring Requirements

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operation control device stack, identified as exhaust E, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 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 Requirement

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust or maintain records of the reason why visible emission notations were not taken.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Rochester Homes, Inc.
Address:	1345 North Lucas Street
City:	Rochester, Indiana 46975
Phone #:	(574) 224-7323
MSOP #:	049-23509-00026

I hereby certify that Rochester Homes, Inc. is still in operation.
 no longer in operation.

I hereby certify that Rochester Homes, Inc. is
 in compliance with the requirements of **MSOP 049-23509-00026**.
 not in compliance with the requirements of **MSOP 049-23509-00026**.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____
*SEE PAGE 2

PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Name:	Rochester Homes, Inc.
Source Location:	1345 North Lucas Street, Rochester, Indiana 46975
County:	Fulton
SIC Code:	2451
Operation Permit No.:	M049-23509-00026
Permit Reviewer:	Tanya White/EVP

On January 27, 2007 the Office of Air Quality (OAQ) had a notice published in the Rochester Sentinel, Rochester, Indiana, stating that Rochester Homes, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a modular home manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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

1. Permit Condition A.1 was revised to remove reference to the authorized individual because it has been determined by IDEM that this information is not necessary to include in the permit and will reduce the need for administrative amendments in the case when the authorized individual changes.

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

The Permittee owns and operates a stationary modular homes manufacturing source.

Authorized Individual:	John Manuel/Vice President of Manufacturing
Source Address:	1345 North Lucas Street, Rochester, IN 46975
Mailing Address:	1345 North Lucas Street, Rochester, IN 46975
General Source Phone Number:	(574) 224-7323
SIC Code:	2451
County Location:	Fulton
	Source Location Status:
	Attainment for all criteria pollutants
Source Status:	Minor Source operating Permit Program
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act

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

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

Source Background and Description

Source Name:	Rochester Homes, Inc.
Source Location:	1345 North Lucas Street, Rochester, Indiana 46975
County:	Fulton
SIC Code:	2451
Operation Permit No.:	F049-15256-00026
Operation Permit Issuance Date:	September 26, 2002
Permit No.:	M049-23509-00026
Permit Reviewer:	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed an application from Rochester Homes, Inc. relating to the operation of a stationary modular home manufacturing source. This source was initially permitted under a Federally Enforceable State Operating Permit (FESOP). On August 11, 2006 Rochester Homes, Inc. requested a transition of their Federally Enforceable State Operating Permit (049-15256-00026) to a Minor Source Operating Permit since the source's potential to emit was shown to be below FESOP thresholds when recalculated after removal of diethylene glycol monobutyl ether acetate from the hazardous air pollutant (HAP) list (326 IAC 1-2-33.5).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) final finish department, using one (1) airless atomization spray gun, along with hand or roller type applications, with a maximum capacity of 0.375 units per hour. The emissions from the operation are emitted near an area inside the building under ceiling vent D.
- (b) One (1) woodworking operation, with a maximum capacity of 2,000 pounds per hour, controlled by a cyclone, exhausting at stack E.
- (c) Two (2) departments for floor, partition, side wall and plumbing, using hand or roller surface coating type applications, each with a maximum capacity of 0.375 units per hour. The emissions from the operations are emitted near areas inside the building under ceiling vents A and B.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (e) Paved and unpaved roads and parking lots with public access.

Unpermitted Emission Units and Pollution Control Equipment

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

Permitted Emission Units and Pollution Control Equipment being Removed from the Permit

According to the source, the following emission units and pollution control equipment were never installed at this plant; therefore, they are being removed from the permit.

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Existing Approvals

The source has been operating under the previous approvals including, but not limited to, the following:

- (a) FESOP 049-15256-00026 issued on September 26, 2002.

This source was initially permitted under a Federally Enforceable State Operating Permit (FESOP). On August 11, 2006 Rochester Homes, Inc. requested a transition of their Federally Enforceable State Operating Permit (049-15256-00026) to a Minor Source Operating Permit since the source's potential to emit was shown to be below FESOP thresholds when recalculated after removal of diethylene glycol monobutyl ether acetate from the hazardous air pollutant (HAP) list (326 IAC 1-2-33.5). Prior to the delisting of diethylene glycol monobutyl ether acetate as a HAP, the potential uncontrolled HAP emissions were determined to be greater than ten (10) tons per year for diethylene glycol monobutyl ether acetate and greater than twenty-five (25) tons per year for the combined source-wide HAPs. With the delisting of diethylene glycol monobutyl ether acetate as a HAP, the potential uncontrolled emissions of any single HAP is less than ten (10) tons per year and less than twenty-five (25) tons per year for a combination of HAPs for this source. As such, the source is now an area source of HAPs, and the potential VOC emissions from this source are greater than twenty-five (25) tons per year, and the potential uncontrolled emissions of all regulated pollutants are less than Part 70 major source thresholds; therefore, the source will be issued a Minor Source Operating Permit (MSOP).

All conditions from previous approvals were incorporated into this permit except permit conditions related to 326 IAC 2-8 (FESOP) since these requirements are no longer applicable. Permit conditions related to 326 IAC 2-6.1 (MSOP) were also added to the permit. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. The Emission unit descriptions in permit Section D.1 have been revised.

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

- (a) ~~Two (2) departments for floor, partition, side wall and plumbing, using hand or roller type application, each with a maximum capacity of 0.375 units per hour. The emissions are emitted fugitively near an area inside the building under ceiling vents A and B.~~
- (ba) One (1) final finish department, using one (1) airless atomization spray gun, along with hand or roller type applications, with a maximum capacity of 0.375 units per hour. The emissions are emitted ~~fugitively~~ near an area inside the building under ceiling vent D.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on August 11, 2006.

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

Emission Calculations

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

Potential to Emit of the Source Before Controls

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

Pollutant	Potential Emissions (tons/yr)
PM	21.40
PM-10	21.46
SO ₂	0.01
VOC	43.69
CO	0.87
NO _x	1.04

HAPs	Potential Emissions (tons/yr)
Hexane	Less than 10
Toluene	Less than 10
Ethylene Glycol	Less than 10
Total	Less than 25

- (a) The potential to emit of all regulated pollutants are less than 100 tons per year and the potential to emit of volatile organic compounds (VOCs) are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (b) 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 are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fulton County has been classified as 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 for the source section.
- (d) Fulton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	5.99
PM-10	6.04
SO ₂	0.01
VOC	43.69
CO	0.87
NO _x	1.04

HAPs	Potential Emissions (tons/yr)
Toluene	5.23
Hexane	5.25
Ethylene Glycol	0.05
Total HAPs	10.52

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.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP 049-23509-00026, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 permit if the PSEU meets the following criteria:
 - (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
 - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
 - (3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

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

State Rule Applicability – Entire Source

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

This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. Therefore, this source is not subject to the requirements of 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

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

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

State Rule Applicability – Individual Facilities

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

- (a) The particulate from the woodworking operations shall not exceed 4.10 pounds per hour when operating at a maximum process weight rate of 2,000 pounds per hour.

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

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

In this case $P = 1.0$ tons per hour; Therefore $E = 4.10 (1.0)^{0.67} = 4.10$ pounds per hour

The woodworking operations are equipped with a cyclone separator for particulate control. The controlled particulate emissions rate from the finish department is 0.41 pounds per hour, which is less than the allowable particulate emission rate of 4.10 pounds per hour. Therefore, the permittee is able to comply with 326 IAC 6-3-2 with the use of a control device.

- (b) The particulate from the final finish department (surface coating operations) shall be controlled by a dry filter, waterwash or an equivalent control method. The source shall use the equivalent control method (work practices) which includes:

- (1) Operate the coating operation inside the building.
- (2) Spray coat only the interior of the homes being manufactured.
- (3) Proper work practices as follows:
 - (A) Spray no farther than 18" from the coating surface.
 - (B) Spray gun pressure shall be maintained at 40 pounds per square inch (psi) or less.
 - (C) The source shall use guns with nozzle size no greater than 0.017".

IDEM has decided that conducting the surface coating operation inside the building and spray coating only the interior of the homes being manufactured can be considered as operating with two layers of enclosures and, therefore, satisfy the requirements of 326 IAC 6-3-2 (d).

All the other coating operations are using hand or roller type coating method, therefore, pursuant to 326 IAC 6-3-1(b), the requirements of 6-3-2 do not apply.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. All coating facilities at this source were constructed in 1972. Therefore, 326 IAC 8-1-6 does not apply.

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

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions of greater than 15 pounds of VOC per day before add-on controls, shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

The coating facilities for Rochester Homes, Inc., which were constructed in 1972, are not subject to this rule since these facilities are located in Fulton County, which is a non-listed county, and the source has potential emissions of VOC of less than 100 tons per year. Therefore, the requirements of this rule do not apply to these facilities. It is noted that these facilities, nonetheless, utilizes what would otherwise be compliant coating application methods.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The source has been in operation before October 7, 1974 and the potential emissions of VOC are less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Fulton County. Therefore, this rule is not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)

This rule applies to any person performing wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County, with the wood furniture manufacturing operations having potential emissions of VOC of 25 tons or more per year and occurring at a source classified with a listed Standard Industrial Classification (SIC) code. This rule is not applicable to this source since it is located in Fulton County.

There are no other article 8 (326 IAC 8) rules that are applicable.

Conclusion

The operation of this stationary modular home manufacturing source shall be subject to the conditions of the Minor Source Operating Permit 049-23509-00026.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Woodworking Operations	Surface Coating	TOTAL
PM	0.02	11.97	9.41	21.40
PM-10	0.08	11.97	9.41	21.46
SO ₂	0.01	0.00	0.00	0.01
NO _x	1.04	0.00	0.00	1.04
VOC	0.06	0.00	43.63	43.69
CO	0.87	0.00	0.00	0.87
total HAPs	0.02	0.00	10.51	10.52
worst case single HAP	0.02	0.00	5.23	5.25
	Hexane		Hexane/Toluene	
Total emissions based on rated capacity at 8,760 hours/year.				

Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Woodworking Operations	Surface Coating	TOTAL
PM	0.02	1.80	4.17	5.99
PM-10	0.08	1.80	4.17	6.04
SO ₂	0.01	0.00	0.00	0.01
NO _x	1.04	0.00	0.00	1.04
VOC	0.06	0.00	43.63	43.69
CO	0.87	0.00	0.00	0.87
total HAPs	0.02	0.00	10.51	10.52
worst case single HAP	0.02	0.00	5.23	5.25
	Hexane		Hexane/Toluene	
Total emissions based on rated capacity at 8,760 hours/year.				

**Appendix A: Emissions Calculations
Natural Gas Combustion (43 heaters)
MM BTU/HR <100**

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

Heat Input Capacity
MMBtu/hr

2.365

Potential Throughput
MMCF/yr

20.7

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.0	0.1	0.9

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAP emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion (43 heaters)
 MM BTU/HR <100
 HAP Emissions**

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.175E-05	1.243E-05	7.769E-04	1.865E-02	3.522E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.179E-06	1.139E-05	1.450E-05	3.936E-06	2.175E-05

Methodology is the same as previous page.

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

Appendix A: Woodworking Particulate Emissions

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

State Potential Emissions (tons/year)					
A. Cyclone					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
E	1	0.01000	4784.0	85.00%	11.97

Total Emissions Based on Rated Capacity at 8,760 Hours/Year

11.97

Federal Potential Emissions (tons/year)					
A. Cyclone					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
E	1	0.01000	4784.0	85.00%	1.80

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls

1.80**Methodology:****Potential (uncontrolled):**

Emissions rate (PM) (tons/yr) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):

Emissions rate (PM) (tons/yr) = Grain loading per actual cubic foot of air outlet (gr/cf)*Air flow rate in actual cubic feet per minute*60 minutes per hour/7000 grains per pound/2000 pounds per ton *8760 hours per year.

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

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Drywall	Latex Interior Paint	12.12	65.00%	60.0%	5.0%	N/A	32.43%	13.50	0.375	0.61	0.61	3.07	73.63	13.44	9.41	1.87	90%
Roofing	Cold Application Cement	8.59	23.00%	0.0%	23.0%	0.0%	70.50%	3.00	0.375	1.98	1.98	2.22	53.34	9.74	0.00	2.80	100%
Flooring	41 Floor Sealer	8.60	0.00%	0.0%	0.0%	0.0%	25.00%	0.13	0.375	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Roofing	Caulk SA 167	12.97	20.00%	0.0%	20.0%	0.0%	70.00%	0.12	0.375	2.59	2.59	0.12	2.80	0.51	0.00	3.71	100%
Flooring	SF-450 Adhesive	9.36	33.00%	0.0%	33.0%	0.0%	55.00%	3.40	0.375	3.09	3.09	3.94	94.52	17.25	0.00	5.62	100%
Roofing	Single Seal	10.70	25.00%	0.0%	25.0%	0.0%	75.00%	0.04	0.375	2.68	2.68	0.04	0.96	0.18	0.00	3.57	100%
Gun Clean	Ener 10	7.99	96.00%	0.0%	96.0%	0.0%	0.00%	0.20	0.375	7.67	7.67	0.58	13.81	2.52	0.00	#DIV/0!	100%

Uncontrolled Potential Emissions (tons/yr)

9.96 239.06 43.63 9.41

Controlled Potential Emissions (tons/yr)

4.17

Note:

Although the source claimed 95 % to 100 % transfer efficiency for the spray applications (higher than 75 %, normally used by IDEM) for the final finish department, but after consulting the IDEM's inspector a transfer efficiency of 90 % was used.

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)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Rochester Homes, Inc.
Address City IN Zip: 1345 North Lucas St., Rochester, IN 46975
MSOP: 049-23509-00026
Reviewer: Tanya White/EVP
Date: 23-Aug-06

Process	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Ethylene Glycol	Toluene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Drywall	Latex Interior Paint (1260-1020)	12.12	13.50	0.375	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Roofing	Cold Application Cement	8.59	3.00	0.375	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Flooring	41 Floor Sealer	8.60	0.13	0.375	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Roofing	Caulk SA 167	12.97	0.12	0.375	0.00%	0.00%	2.00%	0.00	0.00	0.05	0.05
Flooring	SF-450 Adhesive	9.36	3.40	0.375	10.00%	10.00%	0.00%	5.23	5.23	0.00	10.45
Roofing	Single Seal (244660)	10.70	0.04	0.375	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Gun Clean	Ener 10	7.99	0.20	0.375	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00

Uncontrolled Potential to Emit (tons/yr)

5.23 5.23 0.05 10.51

METHODOLOGY

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