INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 10, 2007

RE: Four Winds International, Inc. / 039-23517-00220

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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January 10, 2007

Mr. Dan Piennette
Four Winds International
P.O. Box 1486
Elkhart, Indiana 46515-1486

Re: 039-23517-00220
Fifth Significant Revision to
FESOP 039-14036-00220

Dear Mr. Piennette:

Four Winds International, Inc. was issued a permit on January 7, 2003 for the operation of a stationary motor home/recreational vehicle manufacturing company. A letter requesting changes to this permit was received on August 15, 2006. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the construction of miscellaneous operations and relocation of existing operations to a recently purchased building. This revision includes the following:

1. The construction and operation of the wire harness production operation in Building 4221;

2. The addition of the existing natural gas fired space heating equipment in Building 4221; as insignificant activities, to the source wide emission units.

3. The construction and operation of a new CNC Router in Building 4221;

4. The relocation of existing Class C woodworking operations to Building 4221; and

5. The construction and operation of a baghouse dust collection system for particulate control for the CNC router and relocated woodworking equipment in Building 4221.

The revision has been determined to be significant permit revision pursuant to 2-8-11.1 (f) because the VOC emission limit in condition D.1.1 of the original FESOP is being revised which can not be done through a minor permit revision.

Pursuant to 326 IAC 2-8-11.1, a significant permit revision is hereby approved as described in the attached Technical Support Document (TSD). Please find enclosed the entire revised permit document.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Julia Handley, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (973) 575-2555, ext. 3269 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,
Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
JH/EVP
cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling
IDEM Northern Regional Office

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

Four Winds International, Inc.
701 County Road 15 and 4221 Pine Creek Road
Elkhart, Indiana 46516

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-14036-00220	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 7, 2003 Expiration Date: January 7, 2008
First Significant Permit Revision No.: 039-16264-00220	Issuance Date: March 11, 2003
Second Significant Permit Revision No.: 039-19330-00220	Issuance Date: October 8, 2004
Third Significant Permit Revision No.: 039-20016-00220	Issuance Date: January 13, 2005
Fourth Significant Permit Revision No.: 039-21195-00220	Issuance Date: July 25, 2005

Fifth Significant Permit Revision No.: 039-23517-00220	Pages Affected: 2-24, 25, 30-31, 36-37
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 10, 2007 Expiration Date: January 7, 2008

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, A.3, and A.4 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 motor home/recreational vehicle manufacturing source.

Authorized Individual:	President
Source Address:	701 County Road 15, and 4221 Pine Creek Road Elkhart, Indiana 46516
Mailing Address:	P.O. Box 1486, Elkhart, Indiana 46515-1486
General Source Phone:	(574) 266-1111
SIC Code:	3716
County Location:	Elkhart
County Status:	Nonattainment for 8-hour ozone; and Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; and Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition[326 IAC 2-8-1][326 IAC 2-7-1(22)]

This stationary motor home/recreational vehicle manufacturing company consists of two (2) sites:

(a) Plant site 1 is located at 701 County Road 15, Elkhart, IN; and

(b) Plant site 2 is located at 4221 Pine Creek Road, Elkhart, IN.

Since the two (2) plan sites are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Significant Permit Revision No. 039-23517-00220.

A.3 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:

Three (3) motor home product lines as follows:

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:

(1) Sub-assembly area coating operations, identified as CSA-1, consisting of:
(A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray, and cup gun spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as CFF, consisting of:

(A) hand, aerosol, cup gun spray, and pressure pot spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners

(3) Sub-assembly area woodworking operations, identified as CSA-2, using 1,067 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

(b) One (1) Class A - Line 1, producing a maximum of 1.5 units per hour, installed in June 1999, consisting of the following:

(1) Sub-assembly area coating operations, identified as A1SA, consisting of:

(A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray and airless spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as A1FF, consisting of:

(A) hand, aerosol, high volume low pressure (HVLP) spray, and airless spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(3) Sub-assembly area production operations, including foam insulation cutting and woodworking operations for both Class A Lines 1 and 2, identified as ASA, using 300 pounds of foam insulation and 1,460 pounds of wood per hour, with particulate matter emissions controlled by two (2) cyclones and bag filter, identified as C3, exhausting within the building.

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:

(1) Sub-assembly area coating operations, identified as A2SA and located in Building 750, consisting of:

(A) hand, roll, bead and aerosol application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as A2FF and located in building No. 750, consisting of:

(A) hand and aerosol application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(3) Metal frame undercoating bay, identified as A2U, in building 750, utilizing high pressure flow coat application with no particulate matter emissions.

A.4 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 capacities equal to or less than ten million (10,000,000) BTU per hour, itemized as follows:

(1) Building 650 includes twenty-five (25) 0.10 MMBtu per hour infrared tube heaters, four (4) 0.4 MMBtu per hour thermo cyclers, five (5) 0.3 MMBtu per hour gas fired unit furnaces, one (1) 0.4 MMBtu per hour air make up gas fired furnace, one (1) 2.64 MMBtu per hour air make up gas fired furnace, one (1) 0.15 MMBtu per hour barrel gas fired furnace, one (1) 0.1 MMBtu per hour gas fired unit furnace, three (3) 0.25 MMBtu per hour gas fired unit furnaces, one (1) 0.33 MMBtu per hour gas fired unit furnace, and two (2) 0.35 MMBtu per hour gas fired unit furnaces;

(2) Building 651 includes one (1) 0.13 MMBtu per hour down draft gas fired furnace, three (3) 0.1 MMBtu per hour gas fired furnaces, and one (1) 0.24 MMBtu per hour gas fired furnace;

(3) Building 653 includes one (1) 0.12 MMBtu per hour down draft gas fired furnace, one (1) 0.4 MMBtu per hour thermo cycler, two (2) 0.12 MMBtu per hour infrared tube heaters, and one (1) 1.0 MMBtu per hour air make up gas fired furnace;

(4) Building 654 includes two (2) 0.55 MMBtu per hour air make up gas fired furnaces, eleven (11) 0.12 MMBtu per hour infrared tube heaters, four (4) 0.4 MMBtu per hour thermo cyclers, one (1) 0.49 MMBtu per hour air make up gas fired furnace, one (1) 0.03 MMBtu per hour gas fired unit furnace, two (2) 0.06 MMBtu per hour gas fired unit furnaces, and one (1) 0.1 MMBtu per hour gas fired unit furnace;

(5) Buildings 655 and 656 include one (1) 7.7 MMBtu per hour air make up unit, four (4) 0.08 MMBtu per hour roof top heaters, two (2) 0.125 MMBtu per hour radiant heaters, one (1) 0.06 MMBtu per hour unit heater, one (1) 2.64 MMBtu per hour air make up unit, one (1) 0.58 MMBtu per hour furnace, and one (1) 0.04 MMBtu per hour radiant heater;

(6) Buildings 750 includes six (6) 0.58 MMBtu per hour plant thermo-cycler heaters, two (2) 0.125 MMBtu per hour infrared heaters, one (1) 0.1 MMBtu per hour undercoat space heater, one (1) 0.1 MMBtu per hour compressor room heater, one (1) 0.08 MMBtu per hour breakroom heater, one (1) 0.08 MMBtu per hour office heater, and one (1) 0.06 MMBtu per hour office heater; and

(7) Building 4221 includes one (1) 0.09 MMBtu per hour office heater identified as WHA-01, one (1) 0.072 MMBtu radiant heater identified as WHA-R1, five (5) 0.1 MMBtu radiant heaters identified as WHA-R2, WHA-R3, WHA-R4, and WHA-R5, WHA-R6, two (2) 0.075 MMBtu radiant heaters identified as WHA-R7 and WHA-R9, one (1) 0.08 MMBtu radiant heater identified as WHA-R8 and one (1) 0.75 MMBtu forced air furnace identified as WHA-02.

(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) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(e) Paved and unpaved roads and parking lots with public access;

(f) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings;

(h) Cleaners and solvents characterized as:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) Emergency generators as follows:

Reciprocating engines not exceeding 16,000 horsepower, consisting of:

(1) one (1) 144 hp natural gas fired reciprocating engine; and

(2) one (1) 80 hp natural gas fired reciprocating engine.

(j) Other activities and categories with PM/PM10 emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day:

(1) hand routing at Class A - Line 1, using up to 500 pounds of prefabricated fiberglass reinforced plastic (FRP) parts per hour, utilizing a cyclone (C4) as particulate matter control and exhausting within the building.

(2) steel and aluminum tube plasma/torch cutting and welding at Class C Line, consisting of two (2) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building;

(3) steel and aluminum tube plasma/torch cutting and welding at building 655 for Class A - Line 1 and Line 2 (Diesel Pusher), consisting of four (4) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building;

(4) wood trim cutting at Class A - Line 1 final finish area, in Building 654, using up to 10 pounds of wood per hour, utilizing a cyclone with bag filter (C3) as particulate control and exhausting within the building;

(5) miscellaneous woodworking operations in Building 750, using 960 pounds of wood per hour, utilizing two dust collection systems identified as DC1 and DC2, all exhausting within the building; and

(6) Miscellaneous woodworking operations in Building 4221, identified as WHA-WW, using 400 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building. Wood working activities include one (1) pin router, one (1) table saw, one (1) chop saw, two (2) belt sanders, and one (1) CNC Router, rated at 100.00 ft per minute.

(k) Other activities and categories with negligible PM/PM10 emissions:

(1) steel and aluminum tube cutting at Class A - Line 1, respectively sawing up to 63 and 130 linear feet per hour at an average thickness less than one (1) inch, with deposition of metal shavings in the building;

(2) seven (7) portable dust collectors, as a trivial activity, used at this source to control particulate matter emissions from the facilities and activities listed herein;

(3) hand held routers used at building 655 as a trivial activity; and

(4) Wire harness production operation, identified as WHA, including 26 wire harness soldiering units, each rated at 45 units per hour, and located in building 4221, installed May 2006.

(l) Application of miscellaneous solvents and cleaners for maintenance at the Class C, Class A - Line 1, and Class A - Line 2 product line buildings, with VOC emissions below the insignificant thresholds of three (3) pounds per hour or 15 pounds per day.

A.5 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)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 039-14036-00220, 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 no later than April 15th of each year to:

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.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 describe the following:

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 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 039-14036-00220 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

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

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

B.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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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][IC13-30-3-1]

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

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

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

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

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

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

B.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 2-8-10(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

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) 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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:
- (1) Sub-assembly area coating operations, identified as CSA-1, consisting of:
  - (A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray, and cup gun spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.
- (2) Final finish area coating operations, identified as CFF, consisting of:
  - (A) hand, aerosol, cup gun spray, and pressure pot spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.

(b) One (1) Class A - Line 1, producing a maximum of 1.5 units per hour, installed in June 1999, consisting of the following:
- (1) Sub-assembly area coating operations, identified as A1SA, consisting of:
  - (A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray and airless spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.
- (2) Final finish area coating operations, identified as A1FF, consisting of:
  - (A) hand, aerosol, high volume low pressure (HVLP) spray, and airless spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:
- (1) Sub-assembly area coating operations, identified as A2SA and located in Building 750, consisting of:
  - (A) hand, roll, bead and aerosol application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.
- (2) Final finish area coating operations, identified as A2FF and located in building No. 750, consisting of:
  - (A) hand and aerosol application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and
  - (B) hand and aerosol application of miscellaneous solvents and cleaners.
- (3) Metal frame undercoating bay, identified as A2U, to building 750, utilizing high pressure flow coat application with no particulate matter emissions.

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

(l) Application of miscellaneous solvents and cleaners for maintenance at the Class C, Class A - Line 1, and Class A - Line 2 product line buildings, with VOC emissions below the insignificant thresholds of three (3) pounds per hour or 15 pounds per day.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]

The total combined VOC input usage to the Class C, Class A - Line 1, and Class A - Line 2 product lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents shall be limited to 99.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limitation, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit of VOC to less than 100 tons per year and make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 and nonattainment new source review not applicable to the source.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), operation of facilities CSA-1, CFF, A1SA, A1FF, A2SA and A2FF without the use of add-on controls and with the following work practices will satisfy the BACT requirements:

(a) When applying adhesives to plastic substrates, no coating shall be used with a VOC content of greater than 3.33 pounds of VOC per gallon of coating as applied.

(b) When applying paints or primer coatings to plastic substrates, no coating shall be used with a VOC content of greater than 5.19 pounds of VOC per gallon of coating as applied, except for the touch-up paints used for final finish operations which shall not have VOC content of greater than 6.05 pounds per gallon of coating as applied.

(c) All containers of solvents or solutions shall be kept closed when not in actual use except during product transfers to minimize evaporation.

(d) All waste materials including spent wiping rags and spent solvents shall be stored in closed containers at all times except during product transfers to minimize solvent evaporation.

(e) Unless prepackaged by the manufacturer and intended for use as an aerosol or atomized product, all solvents or solutions used shall be hand or manually applied. Hand or manual application shall include the use of cloths or wipes, including the use of handheld and hand actuated application spray bottles. No solvents or solutions shall be spray applied or applied in a manner that causes excessive atomization or promotes excessive evaporation.

(f) Waste solvents or solutions shall not be disposed by allowing products to evaporate.

(g) Solvent containing rags shall not be allowed to air dry to allow for reuse.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase actual VOC emissions for coating metals to greater than fifteen (15) pounds per day, before add-on controls, when coating metal parts at each of facilities CSA-1, CFF, A1SA, A1FF, A2SA, A2U, and A2FF shall require OAQ's prior approval before such change can take place at any of these facilities.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), surface coatings applied to wood furniture and cabinets at each of facilities CSA-1, CFF, A1SA, A1FF, A2SA or A2FF shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1-1]

(a) The total combined input usage of any single hazardous air pollutant (HAP) to the Class C, Class A - Line 1, and Class A - Line 2 product lines shall be limited to less than 9.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit of any single HAP to less than 10 tons per twelve (12) consecutive month period.

(b) The total combined input usage of all hazardous air pollutants (HAPs) to the Class C, Class A - Line 1, and Class A - Line 2 product lines, shall be limited to less than 24.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit of total HAPs to less than 25 tons per twelve (12) consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 not applicable.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC usage and emission limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC usage limitation contained in condition D.1.1 shall be demonstrated within 30 days of the end of each month and be based on the total volatile organic compound used in the most recent twelve (12) consecutive month period.

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 14-1-1]

(a) Compliance with the single and total HAP usage and emission limitations contained in Condition D.1.5 shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance with other analytical procedures as approved by the commissioner.

(b) Compliance with the single HAP usage limitation contained in condition D.1.5(a) shall be demonstrated within 30 days of the end of each month and based on the single HAP used in the most recent twelve (12) consecutive month period.

(c) Compliance with the HAP usage limitation contained in condition D.1.5(b) shall be demonstrated within 30 days of the end of each month and based on the total HAP used in the most recent twelve (12) consecutive month period.

Compliance Monitoring Requirements

D.1.8 Particulate [326 IAC 6-3-2(d)]

Any change or modification which may increase the coating application rate to greater than five (5) gallons per day from any of the surface coating manufacturing processes CSA-1, CFF, A1SA, A1FF, A2SA, or A2FF shall require a control device, pursuant to 326 IAC 6-3-2(d). Compliance with this limitation shall include only surface coatings that emit or have the potential to emit particulate and does not include surface coatings applied using dip, roll, flow, or brush coatings; applications of aerosol coating products to repair minor surface damage and imperfections; or spray applied glues and adhesives at this source which have been determined by IDEM, OAQ not to have the potential to emit particulate.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly, except where noted, and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Conditions D.1.1, D.1.2 and D.1.4, and the HAP usage limits established in Condition D.1.5. Records taken to demonstrate compliance with Conditions D.1.1 and D.1.5 shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis for the combined Class C, Class A – Line 1, and Class A – Line 2 production operations.

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

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) Method of application for all wood furniture coatings used;

(4) Monthly total combined VOC usage to Class C, Class A - Line 1, and Class A - Line 2 production operations;

(5) Monthly individual and total HAP usage at Class C, Class A - Line 1, and Class A - Line 2 production combined;

(6) The weight of the total VOCs emitted from the three (3) combined product lines, for each compliance period. This shall exclude the weight of VOCs emitted due to wood furniture/cabinet coatings regulated at Condition D.1.4; and

(7) The weight of individual and total HAPs emitted from Class C, Class A - Line 1, and Class A - Line 2 production combined, for each compliance period.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, and D.1.5 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).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) One (1) Class C Line, located in Building 650, producing a maximum of 2.5 units per hour, installed in January 1992, consisting of the following:

(3) Sub-assembly area woodworking operations, identified as CSA-2, using 1,067 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

(b) One (1) Class A - Line 1, producing a maximum of 2 units per hour, installed in June 1999, consisting of the following:

(3) Sub-assembly area production operations, including foam insulation cutting and woodworking operations for both Class A Lines 1 and 2, identified as ASA, using 300 pounds of foam insulation and 1,460 pounds of wood per hour, with particulate matter emissions controlled by two (2) cyclones and bag filter, identified as C3, exhausting within the building.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on the following:

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

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

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Emissions (326 IAC 6-3-2) (lb/hr)
Class C woodworking (CSA-2)	1,067	2.69
Class A - Line 1&2 woodworking & foam cutting (ASA)	1,760	3.76

D.2.2 PM-10 Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]

PM-10 emitted from the process operation control devices shall be limited as follows:

(a) The PM-10 emissions from Class C Line woodworking operations CSA-2 shall not exceed 5.042 pounds of PM-10 emitted per ton of wood processed, based on a maximum throughput of 0.5335 tons (i.e., 1,067 pounds) of wood per hour.

(b) The PM-10 emissions from Class A Lines 1 and 2 foam insulation cutting and woodworking operations ASA shall not exceed 4.273 pounds of PM-10 emitted per ton of foam and wood processed, based on a maximum throughput of 0.880 tons (i.e.,1,760 pounds) of foam and wood per hour.

Based on 8,760 hours of operation per twelve (12) consecutive month period, compliance with this condition limits the potential to emit of PM-10 from the source to less than 100 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to this source. Compliance with this condition shall also make the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD), not applicable to this source.

D.2.3 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 facility CSA-2 and its control devices.

Compliance Determination Requirements

D.2.4 Particulate and PM-10 Control

In order to comply with D.2.1 and D.2.2, the two (2) cyclones and bag dust collector for particulate and PM-10 control to facility CSA-2 shall be in operation and control emissions at all times that CSA-2 woodworking equipment is in operation.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the CSA-2 woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.2.6 Cyclone Failure Detection

In the event that a cyclone failure has been observed at CSA-2:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the CSA-2 woodworking operation stack exhaust.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) 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;

(b) Other activities and categories with PM/PM10 emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day:

(1) miscellaneous woodworking at Class A - Line 1 subassembly, using 425 pounds of wood per hour, exhausting fugitively within the building;

(2) hand routing at Class A - Line 1, using up to 500 pounds of prefabricated fiberglass reinforced plastic (FRP) parts per hour, utilizing a cyclone (C4) as particulate matter control and exhausting within the building;

(3) miscellaneous woodworking operations in Building 750, using 960 pounds of wood per hour, utilizing two dust collection systems identified as DC1 and DC2, all exhausting fugitively within the building~~.~~; and

(4) Miscellaneous woodworking operations in Building 4221, identified as WHA-WW, using 400 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building. Wood working activities include one (1) pin router, one (1) table saw, one (1) chop saw, two (2) belt sanders, and one (1) CNC Router, rated at 100.00 ft per minute.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on the following:

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

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

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Emissions (326 IAC 6-3-2) (lb/hr)
Class A - Line 1 miscellaneous woodworking	425	1.45
Class A - Line 1 routing of fiberglass parts	500	1.62
Building 750 Dust Collector 1 (DC1)	480	1.58
Building 750 Dust Collector 2 (DC2)	480	1.58
Building 4221 Dust Collector 1 (WHA-DC1)	400	1.39

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-6, 326 IAC 8-4-9]

Any change or modification which may increase monthly gasoline throughput to ten thousand (10,000) gallons or more from the gasoline fuel transfer and dispensing operation shall require approval from IDEM, OAQ, prior to making the change.

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

D.3.3 Record Keeping Requirement

To document compliance with Condition D.3.2, the Permittee shall maintain records of total monthly gasoline throughput at the transfer and dispensing station. These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working 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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220
Facility: Class C, Class A - Line 1, and Class A - Line 2 product lines
Parameter: VOC Input
Limit: The total combined VOC input usage to the Class C, Class A - Line 1, and Class A - Line 2 product lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents shall be limited to 99.1 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

YEAR:_____

Month	Column 1: VOC Input (tons)	Column 2: VOC Input (tons)	Column 1 + Column 2: VOC Input (tons)
	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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220
Facility: Class C, Class A - Line 1, and Class A - Line 2 product lines
Parameter: Single and Total HAP Input
Limit: The total combined input usage of any single hazardous air pollutant (HAP) to the Class C, Class A - Line 1, and Class A - Line 2 product lines shall be limited to less than 9.90 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The total combined input usage of all hazardous air pollutants (HAPs) to the Class C, Class A - Line 1, and Class A - Line 2 product lines, shall be limited to less than 24.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

YEAR:_____

Month	Column 1: This Month		Column 2: Previous 11 Months		Column 1 + Column 2: 12 Month Total	
	HAP Input (tons)		HAP Input (tons)		HAP Input (tons)	
	Single HAP Emitted	Total HAP Emitted	Single HAP Emitted	Total HAP Emitted	Single HAP Emitted	Total HAP Emitted
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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Four Winds International, Inc.
Source Location:	701 County Road 15, and 4221 Pine Creek Road, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	F039-14036-00220
Operation Permit Issuance Date:	January 7, 2003
Significant Permit Revision No.:	039-23517-00220
Permit Reviewer:	Julia Handley/ EVP

On November 2, 2006, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth newspaper, in Elkhart County, Indiana, stating that Four Winds International, Inc. had applied for a FESOP Significant Permit Revision for the construction and operation of miscellaneous operations and relocation of existing operations to a recently purchased building. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On November 21, 2006, Four Winds International, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in bold, deletions in ~~strikeout~~):

Comment 1:

Paragraph D.1.6 (a), page 27 of 41: This paragraph requires Four Winds to prepare or obtain “as supplied” and “as applied” VOC data sheets. Four Winds’ suppliers currently provide Material Safety Data Sheets and, in the case of wood furniture surface coatings, certified Product Data Sheets for all coatings. These documents are and have been available to IDEM during inspections and provide the information necessary to evaluate and demonstrate compliance with the underlying regulations. Therefore, allowing Four Winds to continue using the documents it currently has will not prevent IDEM from determining if Four Winds is complying with the requirements of this permit.

Further, Four Winds does not formulate any of the coatings used at its facility. The materials Four Winds uses as coatings are supplied “as is” by outside vendors. Because Four Winds does not formulate any coatings, the Material Safety Data Sheets and Product Data Sheets supplied by the vendor contain all of the information necessary to determine compliance.

Because all of the information necessary to verify and determine compliance is currently available through other mechanisms, requiring Four Winds to prepare or obtain “as supplied” and “as applied” VOC data sheets is duplicative and provides no additional information or environmental protection. Therefore, Four Winds proposes that the following language replace paragraph D.1.6 (a):

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response to Comment 1:

The source must keep records of all solvent used for coatings and those used as cleaning solvents in order to show that the source is in compliance with the limits specified in condition D.1.1, D.1.2 and D.1.3. The VOC emission limitation found in condition D.1.2, references “as applied” VOC content. Therefore both the as supplied and as applied VOC and HAP sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents , as well as other VOC containing compounds used in the Class C, Class A - Line 1, and Class A - Line 2 product lines must be documented. A MSDS or product data sheet as obtained from a manufacturer can serve as an “as supplied” VOC and HAP data sheet, provided that sufficient VOC and HAP content information is included. In the future when the VOC content “as applied” in the Class C, Class A - Line 1, and Class A - Line 2 product lines differs from the “as supplied” VOC content, then an “as applied” VOC data sheet must be obtained from the manufacturer or prepared by the Permitee. No changes to the permit will be made as a result of this comment.

Comment 2:

Paragraph D.1.9 (a) (4), page 29 of 41: Four Winds believes this recordkeeping requirement was included to correspond to paragraph D.1.3. IDEM already has concluded the PTE for the units identified in paragraph D.1.3 is less than the regulatory threshold of 15 lb/day.

As noted by IDEM, Four Winds currently is not subject to 326 IAC 8-2-9. If Four Winds should propose a modification that may *increase* the PTE for these units above the regulatory threshold, paragraph D.1.3 requires Four Winds to obtain IDEM approval before making the modification or change. Because the PTE for the facilities in question is less than 15 lb/day, the regulatory threshold for 326 IAC 8-2-9, maintaining records documenting that the actual emissions are less than 15 lbs/day (which must be the case because actual emissions are always less than or equal to PTE) is unnecessary, unduly burdensome, and result in no environmental benefit. Therefore, Four Winds proposes that paragraph D.1.9 (a) (4) be deleted.

Response to Comment 2:

IDEM has determined that the daily record keeping requirement for VOCs emitted while coating metals will be removed. The record keeping condition was included in the permit to document that the requirements of 326 IAC 8-2-9 do not apply to the source. Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls, shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings. The surface coating emission calculations for the metal coating processes have been revised based on VOC content data for the coatings currently in use and coating usage values based on the usage data from the most recent 12 month period (see pages 1-7 of Appendix A to this addendum). These revised surface coating calculations show that the miscellaneous metal coating activities at each of the six (6) coating areas, A1FF, A1SA, A2FF, A2SA, CFF, and CSA (i.e., facilities) at this source have *potential* VOC emissions of well below 15 pounds per day. Since the potential emissions are below 15 pounds VOC per day, the actual emissions will not exceed 15 pounds per day. Therefore, the record keeping requirement D.1.9 (a) (4) has been removed.

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through ~~(8)~~**(7)**below. Records maintained for (1) through ~~(8)~~**(7)**shall be taken monthly, except where noted, and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Conditions D.1.1, D.1.2 and D.1.4, and the HAP usage limits established in Condition D.1.5. Records taken to demonstrate compliance with Conditions D.1.1 and D.1.5 shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.

***

~~(4) Daily VOC emitted at each of facilities CSA-1, CFF, CUA, A1SA, A1FF, A2SA and A2FF, when coating metal parts and a log of the dates of emissions;~~

~~(5)~~**(4)** Monthly total combined VOC usage to Class C, Class A - Line 1, and Class A - Line 2 production operations;

~~(6)~~**(5)** Monthly individual and total HAP usage at Class C, Class A - Line 1, and Class A - Line 2 production combined;

~~(7)~~**(6)** The weight of the total VOCs emitted from the three (3) combined product lines, for each compliance period. This shall exclude the weight of VOCs emitted due to wood furniture/cabinet coatings regulated at Condition D.1.4; and

~~(8)~~**(7)** The weight of individual and total HAPs emitted from Class C, Class A - Line 1, and Class A - Line 2 production combined, for each compliance period.

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

Comment 3:

Paragraph D.2.3, page 31 of 41: This paragraph requires a preventive maintenance plan for the sub-assembly area woodworking operations identified as CSA-2 and the associated cyclones and bag dust collectors.

326 IAC 1-6-3(a) specifies the information that must be included in a preventive maintenance plan and all of the items identified in that regulation apply to emission control equipment. Facility information that must be included in preventive maintenance plans is not discussed anywhere in 326 IAC 1-6-3(a). Therefore, under the regulations, preventive maintenance plans only apply to the emission control equipment.

In addition, Four Winds does not believe a preventive maintenance plan for the woodworking operations is useful. Unlike control devices where the failure to perform preventive maintenance could result in an increase in emissions, failure to perform preventive maintenance on the woodworking operations would result in the equipment ceasing to operate which would decrease emissions. Therefore, requiring a preventive maintenance plan for CSA-2 results in unnecessary paperwork and no increase in protection for the environment. For this reason, Four Winds proposes that the following language replace paragraph D.2.3:

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the control devices associated with CSA-2.

Response to Comment 3:

The Preventive Maintenance Plan requirement must be included in every applicable FESOP permit pursuant to 326 IAC 2-8-4(9). As such, operation of an emission control device is not the criteria for applicability to 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

The OAQ has determined that a preventive maintenance plan is correctly applied to CSA-2 and its associated control devices, and there is no change to this permit due to this comment.

On December 19, 2006, Four Winds International, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in bold, deletions in ~~strikeout~~):

Comment 4:

References to the Class C Undercoating should be removed from the permit. The Class C Line undercoating area (CUA) was removed from the source in March, 2005, simultaneously with the construction of the Class A - Line 2 metal frame undercoating bay in Building 750 that was approved under Third Significant Permit Revision No. 039-20016-00220, issued on January 13, 2005.

Response to Comment 4:

References to the metal frame undercoating spray application area, identified as CUA, have been removed from the permit and conditions A.3, D.1.3 and D.1.8 have been revised to include the Class A - Line 2 undercoating operations.

A.3 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:

Three (3) motor home product lines as follows:

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:

***

~~(3) Metal frame undercoating spray application area, identified as CUA, with emissions exhausting fugitively into the building.~~

~~(4)~~**(3)** Sub-assembly area woodworking operations, identified as CSA-2, using 1,067 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

***

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:

***

(3) Metal frame undercoating bay**, identified as A2U,** in building 750, utilizing high pressure flow coat application with no particulate matter emissions.

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

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:

(1) Sub-assembly area coating operations, identified as CSA-1, consisting of:

(A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray, and cup gun spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as CFF, consisting of:

(A) hand, aerosol, cup gun spray, and pressure pot spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

~~(3) Metal frame undercoating spray application area, identified as CUA, with emissions exhausting fugitively into the building.~~

***

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:

***

(3) Metal frame undercoating bay**, identified as A2U,** to building 750, utilizing high pressure flow coat application with no particulate matter emissions.

***

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase actual VOC emissions for coating metals to greater than fifteen (15) pounds per day, before add-on controls, when coating metal parts at each of facilities CSA-1, CFF, ~~CUA~~, A1SA, A1FF, A2SA**, A2U,** and A2FF shall require OAQ's prior approval before such change can take place at any of these facilities.

D.1.8 Particulate [326 IAC 6-3-2(d)]

Any change or modification which may increase the coating application rate to greater than five (5) gallons per day from any of the surface coating manufacturing processes CSA-1, CFF, ~~CUA,~~ A1SA, A1FF, A2SA, or A2FF shall require a control device, pursuant to 326 IAC 6-3-2(d). Compliance with this limitation shall include only surface coatings that emit or have the potential to emit particulate and does not include surface coatings applied using dip, roll, flow, or brush coatings; applications of aerosol coating products to repair minor surface damage and imperfections; or spray applied glues and adhesives at this source which have been determined by IDEM, OAQ not to have the potential to emit particulate.

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

Revision 1:

The Table of Contents was revised according to the proposed changes and subsequent conditions were renumbered if conditions were either added or deleted without replication herein.

Revision 2:

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. This rule revision replaces the August 7, 2006 temporary emergency rule found on page 9 of the Technical Support Document, in the county attainment status section.

Revision 3:

First Significant Permit Revision No. 039-16264-00220, issued on March 11, 2003, modified the production rate on the Class A - Line 1 from 2.0 units per hour to 1.5 units per hour. Condition A.3 has been revised to reflect this rate change.

A.3 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:

Three (3) motor home product lines as follows:

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(b) One (1) Class A - Line 1, producing a maximum of ~~2~~ **1.5** units per hour, installed in June 1999, consisting of the following:

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Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Four Winds International, Inc.
Source Location:	701 County Road 15, and 4221 Pine Creek Road, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	F039-14036-00220
Operation Permit Issuance Date:	January 7, 2003
Significant Permit Revision No.:	039-23517-00220
Permit Reviewer:	Julia Handley/ EVP

The Office of Air Quality (OAQ) has reviewed a revision application from Four Winds International, Inc. for the construction and operation of miscellaneous operations and relocation of existing operations to a recently purchased building.

History

On August 15, 2006, Four Winds submitted an application to the OAQ for the construction and operation of miscellaneous operations and relocation of existing operations to a recently purchased building. In May, 2006, Four Winds purchased an existing building located at 4221 Pine Creek Road, Elkhart, Indiana on property contiguous to the existing complex. At the time of purchase, the building contained natural gas fired space heating equipment. In May, 2006, Four Winds began producing wire harnesses for their motor home production facility in Building 4221. Under this Fifth Permit Revision, the source is proposing to relocate some of the Class C woodworking equipment. The rest of the Class C woodworking equipment will remain in Building 650. This revision includes the following:

1. The construction and operation of the wire harness production operation in Building 4221;

2. The addition of the existing natural gas fired space heating equipment in Building 4221, as insignificant activities, to the source wide emission units;

3. The construction of a new CNC Router in Building 4221;

4. The relocation of existing Class C woodworking operations to Building 4221; and

5. The construction of a baghouse dust collection system for particulate control for the CNC router and relocated woodworking equipment in Building 4221.

The proposed revision will result in an increase of potential emissions of particulate matter (PM) and particulate matter less than ten (10) microns (PM_{10}) that is less than twenty-five (25) tons per year and greater than five (5) tons per year.

Source Definition

This Source Definition is incorporated into this permit as follows:

This stationary motor home/recreational vehicle manufacturing company consists of two (2) plants:

(a) Plant site 1 is located at 701 CR 15, Elkhart, IN; and

(b) Plant site 2 is located at 4221 Pine Creek Road, Elkhart, Indiana.

Since the two (2) plant sites are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

Three (3) motor home product lines as follows:

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:

(1) Sub-assembly area coating operations, identified as CSA-1, consisting of:
(A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray, and cup gun spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and
(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as CFF, consisting of:
(A) hand, aerosol, cup gun spray, and pressure pot spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners

(3) Metal frame undercoating spray application area, identified as CUA, with emissions exhausting fugitively into the building.

(4) Sub-assembly area woodworking operations, identified as CSA-2, using 1,067 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

(b) One (1) Class A - Line 1, producing a maximum of 2 units per hour, installed in June 1999, consisting of the following:

(1) Sub-assembly area coating operations, identified as A1SA, consisting of:

(A) hand, roll, bead, aerosol, high volume low pressure (HVLP) spray and airless spray application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as A1FF, consisting of:

(A) hand, aerosol, high volume low pressure (HVLP) spray, and airless spray application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(3) Sub-assembly area production operations, including foam insulation cutting and woodworking operations for both Class A Lines 1 and 2, identified as ASA, using 300 pounds of foam insulation and 1,460 pounds of wood per hour, with particulate matter emissions controlled by two (2) cyclones and bag filter, identified as C3, exhausting within the building.

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:

(1) Sub-assembly area coating operations, identified as A2SA and located in Building 750, consisting of:

(A) hand, roll, bead and aerosol application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as A2FF and located in building No. 750, consisting of:

(A) hand and aerosol application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(3) Metal frame undercoating bay in building 750, utilizing high pressure flow coat application with no particulate matter emissions.

Insignificant Activities

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

(a) Natural gas fired combustion units with heat input capacities equal to or less than ten million (10,000,000) BTU per hour, itemized as follows:

(1) Building 650 includes twenty-five (25) 0.10 MMBtu per hour infrared tube heaters, four (4) 0.4 MMBtu per hour thermo cyclers, five (5) 0.3 MMBtu per hour gas fired unit furnaces, one (1) 0.4 MMBtu per hour air make up gas fired furnace, one (1) 2.64 MMBtu per hour air make up gas fired furnace, one (1) 0.15 MMBtu per hour barrel gas fired furnace, one (1) 0.1 MMBtu per hour gas fired unit furnace, three (3) 0.25 MMBtu per hour gas fired unit furnaces, one (1) 0.33 MMBtu per hour gas fired unit furnace, and two (2) 0.35 MMBtu per hour gas fired unit furnaces.

(2) Building 651 includes one (1) 0.13 MMBtu per hour down draft gas fired furnace, three (3) 0.1 MMBtu per hour gas fired furnaces, and one (1) 0.24 MMBtu per hour gas fired furnace.

(3) Building 653 includes one (1) 0.12 MMBtu per hour down draft gas fired furnace, one (1) 0.4 MMBtu per hour thermo cycler, two (2) 0.12 MMBtu per hour infrared tube heaters, and one (1) 1.0 MMBtu per hour air make up gas fired furnace.

(4) Building 654 includes two (2) 0.55 MMBtu per hour air make up gas fired furnaces, eleven (11) 0.12 MMBtu per hour infrared tube heaters, four (4) 0.4 MMBtu per hour thermo cyclers, one (1) 0.49 MMBtu per hour air make up gas fired furnace, one (1) 0.03 MMBtu per hour gas fired unit furnace, two (2) 0.06 MMBtu per hour gas fired unit furnaces, and one (1) 0.1 MMBtu per hour gas fired unit furnace.

(5) Buildings 655 and 656 include one (1) 7.7 MMBtu per hour air make up unit, four (4) 0.08 MMBtu per hour roof top heaters, two (2) 0.125 MMBtu per hour radiant heaters, one (1) 0.06 MMBtu per hour unit heater, one (1) 2.64 MMBtu per hour air make up unit, one (1) 0.58 MMBtu per hour furnace, and one (1) 0.04 MMBtu per hour radiant heater.

(6) Buildings 750 includes six (6) 0.58 MMBtu per hour plant thermo-cycler heaters, two (2) 0.125 MMBtu per hour infrared heaters, one (1) 0.1 MMBtu per hour undercoat space heater, one (1) 0.1 MMBtu per hour compressor room heater, one (1) 0.08 MMBtu per hour breakroom heater, one (1) 0.08 MMBtu per hour office heater, and one (1) 0.06 MMBtu per hour office heater.

(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) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(e) Paved and unpaved roads and parking lots with public access;

(f) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings;

(h) Cleaners and solvents characterized as:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) Emergency generators as follows:

Reciprocating engines not exceeding 16,000 horsepower, consisting of:

(1) one (1) 144 hp natural gas fired reciprocating engine; and

(2) one (1) 80 hp natural gas fired reciprocating engine.

(j) Other activities and categories with PM/PM10 emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day:

(1) hand routing at Class A - Line 1, using up to 500 pounds of prefabricated fiberglass reinforced plastic (FRP) parts per hour, utilizing a cyclone (C4) as particulate matter control and exhausting within the building;

(2) steel and aluminum tube plasma/torch cutting and welding at Class C Line, consisting of two (2) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building;

(3) steel and aluminum tube plasma/torch cutting and welding at building 655 for Class A - Line 1 and Line 2 (Diesel Pusher), consisting of four (4) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building;

(4) wood trim cutting at Class A - Line 1 final finish area, in Building 654, using up to 10 pounds of wood per hour, utilizing a cyclone with bag filter (C3) as particulate control and exhausting within the building;

(5) miscellaneous woodworking operations in Building 750, using 960 pounds of wood per hour, utilizing two dust collection systems identified as DC1 and DC2, all exhausting fugitively within the building; and

(6) Miscellaneous woodworking operations in Building 4221, identified as WHA-WW, with a combined material usage of 400 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building. Wood working activities, include one (1) pin router, one (1) table saw, one (1) chop saw, two (1) belt sanders, and one (1) disk sander;
Note: these woodworking operations have been relocated to Building 4221 from Building 650.

(k) Other activities and categories with negligible PM/PM10 emissions:

(1) steel and aluminum tube cutting at Class A - Line 1, respectively sawing up to 63 and 130 linear feet per hour at an average thickness less than one (1) inch, with deposition of metal shavings in the building;

(2) seven (7) portable dust collectors, as a trivial activity, used at this source to control particulate matter emissions from the facilities and activities listed herein; and

(3) hand held routers used at building 655 as a trivial activity.

(l) Application of miscellaneous solvents and cleaners for maintenance at the Class C, Class A - Line 1, and Class A - Line 2 product line buildings, with VOC emissions below the insignificant thresholds of three (3) pounds per hour or 15 pounds per day.

(m) Other activities and categories with negligible VOC emissions:
Class A - Line 1 and Line 2 (Diesel Pusher Line) lamination process, located in building No. 655, using non-volatile adhesives applied with a flow coat application system.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Wire harness production operation, identified as WHA, including 26 wire harness soldiering units, each rated at 45 units per hour, and located in building 4221, installed in May, 2006.

(b) Natural gas fired combustion units with heat input capacities equal to or less than ten million (10,000,000) BTU per hour, itemized as follows:

(1) Building 4221 includes one (1) 0.09 MMBtu per hour office heater identified as WHA-01, one (1) 0.072 MMBtu radiant heater identified as WHA-R1, five (5) 0.1 MMBtu radiant heaters identified as WHA-R2, WHA-R3, WHA-R4, and WHA-R5, WHA-R6, two (2) 0.075 MMBtu radiant heaters identified as WHA-R7 and WHA-R9, one (1) 0.08 MMBtu radiant heater identified as WHA-R8 and one (1) 0.75 MMBtu forced air furnace identified as WHA-02.

Note: the above emission units have potential emissions below exemption thresholds listed in 326 IAC 2-1.1-3.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) One (1) CNC Router, located in Building 4221, rated at 100 ft per minute, using 200 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building.

Existing Approvals

The source was issued a FESOP Renewal No. F039-14036-00220 on January 7, 2003. The source has since received the following:

(a) First Significant Permit Revision No. 039-16264-00220, issued on March 11, 2003;

(b) First Administrative Amendment No. 039-18835-00220, issued on July 2, 2004;

(c) Second Significant Permit Revision No. 039-19330-00220, issued on October 8, 2004;

(d) Third Significant Permit Revision No. 039-20016-00220, issued on January 13, 2005;

(e) Second Administrative Amendment No. 039-20810-00220, issued on March 28, 2005;

(f) Fourth Significant Permit Revision No. 039-21195-00220, issued on July 25, 2005;

The source submitted an Appeal Resolution No. 039-22877-02200 on March 31, 2006.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (^{0}F)
WHA-S-O1	Office Heater WHA-O1	21	4	1,350	425
WHA-S-R1	Radiant Heater WHA-R1	20	4	1,250	400
WHA-S-R2	Radiant Heater WHA-R2	20	4	1,500	450
WHA-S-R3	Radiant Heater WHA-R3	21	4	1,500	450
WHA-S-R4	Radiant Heater WHA-R4	20	4	1,500	450
WHA-S-R5	Radiant Heater WHA-R5	20	4	1,500	450
WHA-S-R6	Radiant Heater WHA-R6	21	4	1,500	450
WHA-S-R7	Radiant Heater WHA-R7	20	4	1,250	425
WHA-S-R8	Radiant Heater WHA-R8	20	4	1,500	450
WHA-S-R9	Radiant Heater WHA-R9	20	4	1,500	450
WHA-S-O2	Forced Air Furnace WHA-O2	20	4	1,500	450

Recommendation

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

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

An application for the purposes of this review was received on August 15, 2006. Additional information was received on August 28, 2006 and September 11, 2006.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of Revision Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

Pollutant	Potential To Emit (tons/year)
PM	22.15
PM-10	22.15
SO_2	0.002
VOC	0.03
CO	0.27
NO_x	0.32

Justification for Revision

The FESOP is being modified through a Significant Permit Revision. The VOC emission limit found in condition D.1.1 - Volatile Organic Compounds (VOC) of the original FESOP is being revised because of the new additional units. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) for a request that does not qualify as a Minor permit revision or an administrative amendment, and is considered a significant change to existing permit terms and conditions.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
PM-2.5	attainment
SO_2	attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(b) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

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

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

Source Status

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

Pollutant	Emissions (ton/yr)
PM	19.9
PM10	20.6
SO_2	0.1
VOC	< 100
CO	8.1
NO_x	13.7
single HAP	<10
total HAPs	<25

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

(b) This existing source is not a major stationary source under Emission Offset, 326 IAC 2-3 because Elkhart County was designated as non-attainment for the 8-hour ozone standard on June 15, 2004 and VOC and NOx are emitted at a rate less than 100 tons per year.

(c) These emissions are based upon FESOP Renewal No. F039-14036-00220, issued on January 7, 2003.

Potential to Emit After Controls for the Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the revision.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Building 4221 Natural Gas Space Heating	0.006	0.025	0.002	0.018	0.271	0.323	<10 (single) <25 (total)
Building 42221 Harness Soldering (WHA)	--	--	--	0.01	--	--	
Building 4221 Woodworking (WHA-WW)	0.44	0.44	--	--	--	--	
Total PTE for Revision after Issuance	0.23	0.25	0.002	0.03	0.27	0.32	<10 (single) <25 (total)
Emission Offset Threshold Level	N/A	N/A	N/A	100	N/A	100	N/A
PSD Threshold Level	250	250	250	250	250	250	N/A

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing minor stationary source is not major because the emission increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3 Emissions Offset requirements do not apply.

Potential to Emit of Entire Source Ater Issuance

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 Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (PTE) After Issuance (tons/year)						
Process/emission unit	PM	PM_{10}	SO_2	VOC	CO	NOx	HAPs
Class A - Line 1; Class A - Line 2; and Class C coating operations (Sub-assembly & Final Finish)	2.36	2.36	0.00	<99.1*	0.00	0.00	<10 (single) <25 (total)
Class A Lines 1 & 2 steel & aluminum tube welding**	2.41	2.41	0.00	0.00	0.00	0.00	
Class C Line 2 steel & aluminum tube welding**	2.41	2.41	0.00	0.00	0.00	0.00	
Natural gas combustion as an insignificant activity	0.40	1.16	0.06	0.84	12.70	15.82	
Building 750 Woodworking Operations	13.8	13.8	0.00	0.00	0.00	0.00	
Building 4221 Woodworking (WHA-WW)	0.44	0.44	--	--	--	--	
Building 42221 Harness Soldering (WHA)	--	--	--	0.01	--	--	
Class A Lines 1 & 2 subassembly & final finish woodworking and machining operations**	27.23	27.23	0.00	0.00	0.00	0.00	
Class C subassembly & final finish woodworking operations**	13.23	13.23	0.00	0.00	0.00	0.00	
Total PTE for Source after Issuance	62.28	63.04	0.06	< 100	12.70	15.50	<10 (single) <25 (total)
Emission Offset Threshold Level	N/A	N/A	N/A	100	N/A	100	N/A
PSD Threshold Level	250	250	250	N/A	250	250	N/A
Part 70 Threshold Level	100	100	100	100	100	100	10 (single) 25 (total)

* Reflects revised source-wide VOC emission limitation Condition D.1.1
** Reflects 326 IAC 6-3-2(e) allowable emission rate (lb/hr) extrapolated on an equivalent annual basis assuming 8,760 hours of operation.

This modification to an existing minor stationary source is not major because the emission increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3 Emissions Offset requirements do not apply.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The potential to emit of all regulated pollutants is less than the Part 70 threshold levels. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source as a result of this revision.

(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 as a result of this revision.

State Rule Applicability

326 IAC 8-1-6 (New Facilities, 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 which are not otherwise regulated by another provision of Article 8. Since this modification has the potential to emit less than 25 tons per year VOC, this modification is not subject to 326 IAC 8-1-6.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to this rule the particulate matter (PM) from the Building 4221 Woodworking operation shall be limited by the following:

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

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

The maximum process rate for the Building 4221 Woodworking operation, identified as WHA-WW, is 0.20 tons per hour. Hence, based on the above formula the allowable particulate emission rate shall be 1.39 pounds per hour. The baghouse, identified as WHA-DC1, shall be in operation at all times that the Building 4221 woodworking operation is in operation, in order to comply with this limit.

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore the requirements of the previous version of 326 IAC 6-3 are no longer applicable to this source. Pursuant to 326 IAC 6-3-2(d)(4) these Class C, Class A - Line 1, and Class A - Line 2 sub-assembly**,** and final finish area surface coating operations, identified as CSA-1, CFF, CUA, A1SA, A1FF, A2SA, and A2FF are not subject to the requirements of 6-3-2 because less than 5 gallons of coating are used per day in their “surface coating” operations, as defined in 326 IAC 6-3-1.5.

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.

Testing Requirements

Compliance testing is not required since the woodworking operations are controlled by baghouse and, along with other processes, have emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

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

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

There are no new compliance monitoring requirements applicable to this revision.

Changes to the Federally Enforceable State operating Permit (FESOP) due to this Revision:

The following changer are made as the Fifth Significant Permit revision to FESOP Renewal No. 039-114036-00220 (new language is shown in bold and deleted language is shown with ~~a line through it~~):

(1) The Table of Contents was revised according to the proposed changes.

(2) Subsequent conditions were renumbered if conditions were either added or deleted.

(3) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

(4) Building 657 was renamed "Building 750" in Second Administrative Amendment No. 039-20810-00220. However, not all references to Building 657 were revised as part of the second administrative amendment. Accordingly references to Building 657 have been revised throughout the permit.

(5) The source location and address has been revised throughout the permit to incorporate the address of the recently purchased Building 4221.

(6) Condition A.2 - Source Definition was added to incorporate the Building 4221 as part of this FESOP source.

(7) Condition A.2 (renumbered A.3) - Emission Units and Pollution Control Equipment Summary was revised to reflect the relocation of certain Class C woodworking equipment to Building 4221.

(8) Condition A.3 (renumbered A.4) - Insignificant Activities is revised to reflect the addition of the building 4221 natural gas heating equipment, Building 4221 wire harness production operation, and building 4221 woodworking operations (comprised of relocated Class C equipment and the proposed CNC router) as an insignificant activity. The descriptive heading for subsection (j) was erroneously left in previous permit revision and administrative amendments. The section heading is added and the subsequent numbering of activities is corrected.

(9) Condition A.5 – Prior Permits Superseded (renumbered B.13) has been moved to Section B within the permit.

(10) Condition B.3 (renumbered B.2) - Permit Term has been revised for clarity.

(11) A statement was added to B.11 (renumbered B.9) Certification in order to clarify that the certification form may cover more than one document that is submitted.

(12) In an IDEM Nonrule Policy Document, a table is a given as an example for how sources can submit annual compliance certifications. B.12 (renumbered B.10) - Annual Compliance Certification is being revised to remove “in letter form” so that it does not contradict the guidance.

(13) Condition B.13 (renumbered B.11)- Preventive Maintenance Plan has been revised because IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.13 (renumbered B.11) – Preventive Maintenance, amended Condition B.14 (renumbered B.12) – Emergency Provisions and Condition D.2.8 (renumbered D.2.7) – Record Keeping Requirements and deleted condition D.2.6 - Cyclone Inspections.

(14) Condition B.17 - Permit Renewal has been updated for clarity.

(15) IDEM has clarified Condition B.19 - Operational Flexibility.

(16) Condition B.23 - Annual Fee Payment has been updated to reflect the correct name of the section.

(17) Condition B.24 - Credible Evidence has been added. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective on March 16, 2005.

(18) Condition B.3 - Terms of Conditions has been added.

(19) Condition C.2 (renumbered C.1)- Particulate Matter Emission Limitations For Processes with Process Weight Rates Less than 100 Pounds per Hour, has been revised to reflect the current rule and capitalize “Pounds” and “Hour”.

(20) In order to avoid duplication of requirements which may be included in D sections, Condition C.7 – Operation of Equipment has been removed from the permit.

(21) Condition C.13 (renumbered C.15) - Compliance Monitoring Plan has been revised because IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The title of Condition C.13 (renumbered C.15) was changed to Response to Excursions or Exceedances. The Section D conditions including Condition D.2.6 (renumbered D.2.5) – Visible Emissions Notations and Condition D.2.7 (renumbered D.2.6) – Cyclone Failure Detection, that refer to this condition have been revised to reflect the new condition title.

(22) IDEM has added condition C.13 due to the monitoring requirements specified in Condition D.1.10 (renumbered D.1.9) Performance Testing.

(23) Clarification has been added to (e) of C.18 General Reporting Requirements, for what calendar year means.

(24) Condition D.1.1 was revised because the source has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The VOC usage limit is revised to limit the source-wide VOC emissions to less than 100 tons per year. In addition, this condition was revised to remove references to the VOC content of materials shipped offsite. The source has asked that this revision be made because they do not test the VOC content of materials sent offsite and do not take credit for VOC in waste shipments when calculating total VOC emissions.

(25) Condition D.1.5 was revised to remove references to the HAP content of materials sent offsite. The source has asked that this revision be made because they do not test the single or total HAP content of materials sent offsite and do not take credit for single or total HAP in waste shipments when calculating source-wide single or total HAP emissions.

(26) Condition D.1.6 was revised to make condition D.1.1 federally enforceable. Condition D.1.7 was added to make condition D.1.5 federally enforceable. And, condition D.1.10 (renumbered D.1.9) – Record Keeping was revised to clarify the record keeping requirements associated with conditions D.1.1 and D.1.5.

(27) The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore the requirements of the previous version of 326 IAC 6-3 are no longer applicable to this source. Pursuant to 326 IAC 6-3-2(d)(4) the surface coating operations are not subject to the requirements of 6-3-2 because less than 5 gallons of coating are used per day in their “surface coating” operations, as defined in 326 IAC 6-3-1.5. Accordingly, conditions D.1.6 was removed and Condition D.1.10 (renumbered D.1.9) was revised.

(28) The Section D.2 facility description box and section D.2 conditions are revised to reflect the partial relocation of the Class C woodworking operations to building No. 4221, as an insignificant activity as listed under section D.3. As a result of the proposed relocation, the rating of Class C woodworking operations, identified as CSA-2, will be changed from 1,267 to 1,067 pounds of wood per hour.

(29) The Section D.3 facility description box is revised to reflect the addition of the CNC router and relocation of various Class C woodworking operations to Building 4221 as well as the name change from Building 657 to Building 750.

(30) Condition D.3.1 Particulate is revised to reflect the addition of the CNC router and relocation of various Class C woodworking operations to Building 4221 and the name change from Building 657 to Building 750.

(31) Quarterly reporting forms for Conditions D.1.1 and D.1.5 have been added. They were erroneously left out of the Second Significant Permit Revision No. 039-19330-00220.

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~~**, A.3, and A.4** 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 motor home/recreational vehicle manufacturing source.

Authorized Individual:	President
Source Address:	701 County Road 15, Elkhart, **and 4221 Pine Creek Road,** Elkhart, Indiana 46516
Mailing Address:	P.O. Box 1486, Elkhart, Indiana 46515-1486
General Source Phone:	(574) 266-1111
SIC Code:	3716
County Location:	Elkhart
County Status:	Nonattainment for 8-hour ozone; and Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; and Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition[326 IAC 2-8-1][326 IAC 2-7-1(22)]

This stationary motor home/recreational vehicle manufacturing company consists of two (2) sites:

(a) Site 1 is located at 701 County Road 15, Elkhart, IN; and

(b) Site 2 is located at 4221 Pine Creek Road, Elkhart, IN.

Since the two (2) site are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Significant Permit Revision No. 039-23517-00220.

A.~~2~~**3** 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:

Three (3) motor home product lines as follows:

(a) One (1) Class C Line, producing a maximum of 3.125 units per hour, installed in January 1992, consisting of the following:

***

(4) Sub-assembly area woodworking operations, identified as CSA-2, using ~~1,267~~ **1,067** pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

***

(c) One (1) Class A - Line 2 (Diesel Pusher Production Line), producing a maximum of 1.0 units per hour, installed in 2002, consisting of the following:

(1) Sub-assembly area coating operations, identified as A2SA and located in Building ~~657~~ **750**, consisting of:

(A) hand, roll, bead and aerosol application of miscellaneous coatings and adhesives applied to metal, wood construction materials, pre-finished wood cabinets and counter tops, plastic, and fiberglass product parts during motor home assembly, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(2) Final finish area coating operations, identified as A2FF and located in building No. ~~657~~ **750**, consisting of:

(A) hand and aerosol application of miscellaneous coatings applied to metal, wood construction materials, pre-fabricated cabinets and counter tops, and fiberglass parts during motor home finishing and touch-up, with emissions exhausting fugitively into the building; and

(B) hand and aerosol application of miscellaneous solvents and cleaners.

(3) Metal frame undercoating bay ~~to~~ **in** building ~~657~~ **750**, utilizing high pressure flow coat application with no particulate matter emissions.

A.~~3~~**4** 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 capacities equal to or less than ten million (10,000,000) BTU per hour, itemized as follows:

***

(6) Buildings ~~657~~ **750** includes six (6) 0.58 MMBtu per hour plant thermo-cycler heaters, two (2) 0.125 MMBtu per hour infrared heaters, one (1) 0.1 MMBtu per hour undercoat space heater, one (1) 0.1 MMBtu per hour compressor room heater, one (1) 0.08 MMBtu per hour breakroom heater, one (1) 0.08 MMBtu per hour office heater, and one (1) 0.06 MMBtu per hour office heater~~.~~**; and**

(7) Building 4221 includes one (1) 0.09 MMBtu per hour office heater identified as WHA-01, one (1) 0.072 MMBtu radiant heater identified as WHA-R1, five (5) 0.1 MMBtu radiant heaters identified as WHA-R2, WHA-R3, WHA-R4, and WHA-R5, WHA-R6, two (2) 0.075 MMBtu radiant heaters identified as WHA-R7 and WHA-R9, one (1) 0.08 MMBtu radiant heater identified as WHA-R8 and one (1) 0.75 MMBtu forced air furnace identified as WHA-02.

***

(j) Other activities and categories with PM/PM10 emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day:

(~~2~~**1**) hand routing at Class A - Line 1, using up to 500 pounds of prefabricated fiberglass reinforced plastic (FRP) parts per hour, utilizing a cyclone (C4) as particulate matter control and exhausting within the building.

(~~3~~**2**) steel and aluminum tube plasma/torch cutting and welding at Class C Line, consisting of two (2) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building;

(~~4~~**3**) steel and aluminum tube plasma/torch cutting and welding at building 655 for Class A - Line 1 and Line 2 (Diesel Pusher), consisting of four (4) floor assembly welding stations each using a maximum of 10 pounds of welding wire per hour and four (4) sidewall/roof assembly welding stations each using a maximum of 5 pounds of welding wire per hour, all exhausting within the building; ~~and~~

(~~5~~**4**) wood trim cutting at Class A - Line 1 final finish area, in Building 654, using up to 10 pounds of wood per hour, utilizing a cyclone with bag filter (C3) as particulate control and exhausting within the building~~.~~**;**

(~~6~~**5**) miscellaneous woodworking operations in Building ~~657~~ **750**, using 960 pounds of wood per hour, utilizing two dust collection systems identified as DC1 and DC2, all exhausting within the building~~.~~**; and**

(6) Miscellaneous woodworking operations in Building 4221, identified as WHA-WW, with a combined material usage of 400 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building. Wood working activities, include one (1) pin router, one (1) table saw, one (1) chop saw, two (1) belt sanders, one (1) disk sander and one (1) CNC Router, rated at 100 ft per minute.

(k) Other activities and categories with negligible PM/PM10 emissions:

***

(2) seven (7) portable dust collectors, as a trivial activity, used at this source to control particulate matter emissions from the facilities and activities listed herein; ~~and~~

(3) hand held routers used at building 655 as a trivial activity~~.~~**; and**

(4) Wire harness production operation, identified as WHA, including 26 wire harness soldiering units, each rated at 45 units per hour, and located in building 4221, installed May 2006.

***

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

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

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted~~

~~by this permit.~~

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

~~SECTION B GENERAL CONDITIONS~~

~~B.1 Permit No Defense [IC 13]~~

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

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

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

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

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

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

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

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

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

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

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

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

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

~~B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) 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.

(c) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

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

~~B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]~~

~~(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 April 15 of each year to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

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

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

~~(2) The compliance status;~~

~~(3) Whether compliance was continuous or intermittent;~~

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

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

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

~~B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]~~

~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.~~

~~The Permittee may use documents prepared pursuant to other condition(s) of this permit to satisfy this PMP requirement. Upon request, the Permittee shall provide IDEM, OAQ clear reference and access to other documents used to satisfy this PMP requirement.~~

~~(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.14 Emergency Provisions [326 IAC 2-8-12]

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 the IDEM 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.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 1-800-753-5519 (IDEM Northern Regional Office)
Facsimile No.: 219-245-4877 (IDEM Northern Regional Office)

(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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

~~(A) A description of the emergency;~~

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

~~(C) Corrective actions taken.~~

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

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

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

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

~~(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.~~

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

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

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

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

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

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.~~

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

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

~~B.15 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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, P.O. Box 6015
Indianapolis, IN 46206-6015

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

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

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

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

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

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

B.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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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 emissions allowable under 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana
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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

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

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

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

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

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

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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

B.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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make 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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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 the source's potential to emit does not exceed the above specified limits.

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

C.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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.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 Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

~~C.8 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.9 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

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) 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 that the inspector be accredited is federally enforceable.

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

C.10 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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.11 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.12 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.~~

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

~~C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

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

~~C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]~~

~~If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

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

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

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

~~The Permittee may use documents prepared to comply with other condition(s) of this permit to satisfy this CRP requirement. Upon request, the Permittee shall provide IDEM, OAQ with clear reference and access to other documents used to satisfy this CRP requirement.~~

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

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

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

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15 of each year in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information 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 kept 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.19 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 the "authorized individual" as defined by 326 IAC2-1.1-1(1).

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

~~Indiana Department of Environmental Management~~
~~Compliance Data Section, Office of Air Quality~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

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

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

~~(e) Reporting periods are based on calendar years.~~

~~Stratospheric Ozone Protection~~

~~C.20 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 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)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 039-14036-00220, 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 no later than April 15th of each year to:

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.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 describe the following:

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 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 039-14036-00220 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

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

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

B.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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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(a)]
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][IC13-30-3-1]

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

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

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

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

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

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

B.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 2-8-10(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

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) 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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]

The total combined VOC input usage to the Class C, Class A - Line 1, and Class A - Line 2 product lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents~~, minus used VOC in coating or cleanup solvents shipped off site~~, shall be limited to ~~99.5~~ **99.1** tons per twelve (12) consecutive month period with compliance ~~demonstrated~~ **determined** at the end of each month. ~~This usage limit is equivalent to 99.5 tons of VOC emitted per 12 consecutive month period.~~

Compliance with this limitation, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit of VOC to less than 100 tons per year and make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 and nonattainment new source review not applicable to the source.

D.1.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1-1]

(a) The total combined input usage of any single hazardous air pollutant (HAP) to the Class C, Class A - Line 1, and Class A - Line 2 product lines~~, minus used HAP solvent shipped off site,~~ shall be limited to less than ~~10~~ **9.8** tons per twelve (12) consecutive month period with compliance ~~demonstrated~~ **determined** at the end of each month. ~~This usage limit is equivalent to 10 tons of single HAP emitted per 12 consecutive month period.~~ Compliance with this condition**, including the potential to emit for insignificant activities,** shall limit the source-wide potential to emit **of any** ~~a~~ single HAP to less than 10 tons per twelve (12) consecutive month period.

(b) The total combined input usage of all hazardous air pollutants (HAPs) to the Class C, Class A - Line 1, and Class A - Line 2 product lines~~, minus used HAP solvent shipped off site,~~ shall be limited to less than 24.8 tons per twelve (12) consecutive month period with compliance ~~demonstrated~~ **determined** at the end of each month. ~~This usage limit is equivalent to 24.8 tons of total HAPs emitted per 12 consecutive month period.~~ Compliance with this condition, including the potential to emit for insignificant activities, shall limit the source-wide potential to emit **of** total HAPs to less than 25 tons per **twelve** ~~12~~ **(12)** consecutive month period.

***

~~D.1.6 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P and FESOP 039-5814-00220 issued on December 9, 1996, the particulate matter from the spray coatings applied at the Class C, Class A - Line 1, and Class A - Line 2 sub-assembly, and final finish areas CSA 1, CFF, CUA, A1SA, A1FF, A2SA, and A2FF each shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

D.1.~~7~~ **6** Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC usage and emission limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC usage limitation contained in condition D.1.1 shall be demonstrated within 30 days of the end of each month and be based on the total volatile organic compound used in the most recent twelve (12) consecutive month period.

~~D.1.8 VOC and HAP Emissions~~

~~Compliance with Conditions D.1.1 for VOC emissions and D.1.5 for HAP emissions shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, single HAP and combined HAP usage for the most recent twelve (12) month period.~~

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 14-1-1]

(a) Compliance with the single and total HAP usage and emission limitations contained in Condition D.1.5 shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance with other analytical procedures as approved by the commissioner.

(b) Compliance with the single HAP usage limitation contained in condition D.1.5(a) shall be demonstrated within 30 days of the end of each month and based on the single HAP used in the most recent twelve (12) consecutive month period.

(c) Compliance with the HAP usage limitation contained in condition D.1.5(b) shall be demonstrated within 30 days of the end of each month and based on the total HAP used in the most recent twelve (12) consecutive month period.

D.1.~~9~~ **8** Particulate [326 IAC 6-3-**2(d)**

Any change or modification which may increase the coating application rate to greater than five (5) gallons per day from any of **the** surface coating manufacturing processes CSA-1, CFF, CUA, A1SA, A1FF, A2SA, or A2FF shall require a control device, pursuant to 326 IAC 6-3-2(d). Compliance with this limitation shall include only surface coatings that emit or have the potential to emit particulate and does not include surface coatings applied using dip, roll, flow, or brush coatings; applications of aerosol coating products to repair minor surface damage and imperfections; or spray applied glues and adhesives at this source which have been determined by IDEM, OAQ not to have the potential to emit particulate.

D.1.~~10~~**9** Record Keeping Requirements

(a) To document compliance with Conditions ~~D.1.1 through D.1.4~~ **D.1.1, D.1.2, D.1.4, and D.1.5**, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly, except where noted, and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Conditions D.1.1, D.1.2 and D.1.4, and the HAP usage limits established in Condition D.1.5. Records taken to demonstrate compliance with Conditions D.1.1 and D.1.5 shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis for the combined Class C, Class A – Line 1, and Class A – Line 2 production operations.

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

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. ~~Records of used solvent sent off site as waste shall be maintained when such is included in a demonstration of compliance with D.1.1 through D.1.5.~~

(3) Method of application for all wood furniture coatings used;

(4) Daily VOC emitted at each of facilities CSA-1, CFF, CUA, A1SA, A1FF, A2SA and A2FF, when coating metal parts and a log of the dates of emissions;

(5) Monthly total combined VOC usage to Class C, Class A - Line 1, and Class A - Line 2 production operations;

(6) Monthly individual and total HAP usage at Class C, Class A - Line 1, and Class A - Line 2 production combined;

(7) The weight of the total VOCs emitted from the three (3) combined product lines, for each compliance period. This shall exclude the weight of VOCs emitted due to wood furniture/cabinet coatings regulated at Condition D.1.4; and

(8) The weight of individual and total HAPs emitted from Class C, Class A - Line 1, and Class A - Line 2 production combined, for each compliance period.

~~(b) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily coating usage at each of facilities CSA-1, CFF, CUA, A1SA, A1FF, A2SA and A2FF when using coatings not specifically excluded in Condition D.1.9.~~

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) One (1) Class C Line, **located in Building 650,** producing a maximum of 2.5 units per hour, installed in January 1992, consisting of the following:

(4) Sub-assembly area woodworking operations, identified as CSA-2, using ~~1,267~~ **1,067** pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone with bag dust collector exhausting within the building and one (1) cyclone dust collector exhausting to the atmosphere.

(b) One (1) Class A - Line 1, producing a maximum of 2 units per hour, installed in June 1999, consisting of the following:

(3) Sub-assembly area production operations, including foam insulation cutting and woodworking operations for both Class A Lines 1 and 2, identified as ASA, using 300 pounds of foam insulation and 1,460 pounds of wood per hour, with particulate matter emissions controlled by two (2) cyclones and bag filter, identified as C3, exhausting within the building.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on the following:

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

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

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Emissions (326 IAC 6-3-2) (lb/hr)
Class C woodworking (CSA-2)	~~1,267~~ **1,067**	~~3.02~~ **2.69**
Class A - Line 1&2 woodworking & foam cutting (ASA)	1,760	3.76

D.2.2 PM-10 Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]~~[40CFR 52.21]~~

PM-10 emitted from the process operation control devices shall be limited as follows:

(a) The PM-10 emissions from Class C Line woodworking operations CSA-2 shall not exceed ~~4.763~~ **5.042** pounds of PM-10 emitted per ton of wood processed~~.~~**,** ~~This is equivalent to 3.02~~ **2.69** ~~pounds of PM-10 per hour,~~ based on a maximum throughput of ~~0.634~~ **0.5335** tons (i.e., ~~1,267~~ **1,067** pounds) of wood per hour.

(b) The PM-10 emissions from Class A Lines 1 and 2 foam insulation cutting and woodworking operations ASA shall not exceed 4.273 pounds of PM-10 emitted per ton of foam and wood processed~~.~~**,** ~~This is equivalent to 3.76 pounds of PM-10 per hour,~~ based on a maximum throughput of 0.880 tons (i.e.,1,760 pounds) of foam and wood per hour.

Based on 8,760 hours of operation per twelve (12) consecutive month period, compliance with this condition limits the potential to emit of PM-10 from the source to less than 100 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to this source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 ~~and 40 CFR 52.21~~, Prevention of Significant Deterioration (PSD), not applicable to this source.

~~D.2.6 Cyclone Inspections~~

~~An inspection shall be performed each calender quarter of the cyclone controlling woodworking operation CSA-2 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.~~

D.2.6**5** Visible Emissions Notations

***

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~ **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.2.7**6** Cyclone Failure Detection

In the event that a cyclone failure has been observed at CSA-2:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and~~ Reports **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.8**7** Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the CSA-2 woodworking operation stack exhaust.

~~(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.~~

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

~~There are no specific reporting requirements applicable to these facilities.~~

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) 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;

(b) Other activities and categories with PM/PM10 emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day:

(1) miscellaneous woodworking at Class A - Line 1 subassembly, using 425 pounds of wood per hour, exhausting within the building;

(2) hand routing at Class A - Line 1, using up to 500 pounds of prefabricated fiberglass reinforced plastic (FRP) parts per hour, utilizing a cyclone (C4) as particulate matter control and exhausting within the building;

(3) miscellaneous woodworking operations in Building ~~657~~ **750**, using 960 pounds of wood per hour, utilizing two dust collection systems identified as DC1 and DC2, all exhausting within the building~~.~~**; and**

(4) **Miscellaneous woodworking operations in Building 4221, identified as WHA-WW, with a combined material usage of 400 pounds of wood per hour, utilizing a baghouse for particulate control, identified as WHA-DC1 exhausting within the building. Wood working activities, include one (1) pin router, one (1) table saw, one (1) chop saw, two (1) belt sanders, one (1) disk sander and one (1) CNC Router, rated at 100 ft per minute.**

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on the following:

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

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

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Emissions (326 IAC 6-3-2) (lb/hr)
Class A - Line 1 miscellaneous woodworking	425	1.45
Class A - Line 1 routing of fiberglass parts	500	1.62
Building ~~657~~ **750** Dust Collector 1 (DC1)	480	1.58
Building ~~657~~ **750** Dust Collector 2 (DC2)	480	1.58
Building 4221 Dust Collector 1 (WHA-DC1)	**400**	**1.39**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working 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:

***

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

FESOP Quarterly Report

Source Name: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220
Facility: Class C, Class A - Line 1, and Class A - Line 2 product lines
Parameter: VOC Input
Limit: The total combined VOC input usage to the Class C, Class A - Line 1, and Class A - Line 2 product lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and VOC solvents shall be limited to 99.1 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

YEAR:_____

Month	Column 1: VOC Emitted (tons)	Column 2: VOC Emitted (tons)	Column 1 + Column 2: VOC Emitted (tons)
	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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220
Facility: Class C, Class A - Line 1, and Class A - Line 2 product lines
Parameter: Single and Total HAP Input
Limit: The total combined input usage of any single hazardous air pollutant (HAP) to the Class C, Class A - Line 1, and Class A - Line 2 product lines shall be limited to less than 9.90 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The total combined input usage of all hazardous air pollutants (HAPs) to the Class C, Class A - Line 1, and Class A - Line 2 product lines, shall be limited to less than 24.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

YEAR:_____

Month	Column 1: This Month		Column 2: Previous 11 Months		Column 1 + Column 2: 12 Month Total	
	HAP Input (tons)		HAP Input (tons)		HAP Input (tons)	
	Single HAP Emitted	Total HAP Emitted	Single HAP Emitted	Total HAP Emitted	Single HAP Emitted	Total HAP Emitted
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: Four Winds International, Inc
Source Address: 701 County Road 15, Elkhart, IN 46516
and 4221 Pine Creek Road, Elkhart, IN 46516
Mailing Address: P.O. Box 1486, Elkhart, IN 46515-1486
FESOP No.: F039-14036-00220

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

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

***

Conclusion

The operation of this stationary motor home/recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Significant Permit Revision No. 039-23517-00220.

Appendix A: Emissions Calculations
Summary Emissions

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46516
Permit No. 039-23517-00220
Reviewer: JH/EVP

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	* Highest Single HAP	Combined HAP
Natural Gas Space Heating	0.006	0.025	0.002	0.323	0.018	0.271	0.00	2.81E-04
Harness Soldering (WHA)	0.00	0.00	0.00	0.00	0.01	0.00	8.21E-05	8.21E-05
Miscellaneous Woodworking (WHA-WW)**	22.15	22.15	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	22.16	22.17	0.002	0.32	0.03	0.27	8.21E-05	3.63E-04

POTENTIAL TO EMIT AFTER CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	* Highest Single HAP	Combined HAP
Natural Gas Space Heating	0.006	0.025	0.002	0.323	0.018	0.271	0.00	2.81E-04
Harness Soldering (WHA)	0.00	0.00	0.00	0.00	0.01	0.00	8.21E-05	8.21E-05
Miscellaneous Woodworking (WHA-WW)**	0.22	0.22	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	0.23	0.24	0.002	0.32	0.03	0.27	8.21E-05	3.63E-04

*Lead

** Potential to emit based upon PM emissions from proposed CNC router alone and not relocated existing Class C woodworking equipment.

HAZARDOUS AIR POLLUTANTS

Emission Units	Lead	Total HAP
Natural Gas Space Heating	ND	2.81E-04
Harness Soldering (WHA)	8.21E-05	8.21E-05
Miscellaneous Woodworking (WHA-WW)**	0.00	0.00
TOTAL	0.00	3.63E-04

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46516
Permit No. 039-23517-00220
Reviewer: JH/EVP

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Office Heater	1	WHA-O1	0.090	0.8
Radiant Heater	1	WHA-R1	0.072	0.6
Radiant Heater	5	WHA-R2 thru R6	0.100	4.4
Radiant Heater	1	WHA-R7	0.075	0.7
TOTALS	8		0.737	6.5

Emission Factor (lbs/MMCF)						
PM*	PM10*	SO2	NOX**	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO2	NOX	CO	VOC	HAPs
WHA-O1	0.001	0.003	0.00	0.04	0.03	0.00	0.00
WHA-R1	0.001	0.002	0.00	0.03	0.03	0.00	0.00
WHA-R2 thru R6	0.004	0.017	0.00	0.22	0.18	0.01	0.00
WHA-R7	0.00	0.00	0.00	0.03	0.03	0.00	0.00
TOTALS	**0.006**	**0.025**	**0.002**	**0.323**	**0.271**	**0.018**	**2.8E-04**

* PM emission factor is for filterable particulate matter. PM10 emission factor is for condensable and filterable particulate matter combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

METHODOLOGY

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.

Appendix A: Emissions Calculations
Particulate and Volatile Organic Compound Emissions
Wire Harness Assembly Operations (WHA)

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46516**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Material Usage Rate (lb/hr)	PM/PM10 & Lead Emission Basis Data EF (lb/ton)	Emission Rate PM/PM10 & Lead PTE (lb/hr)	(lb/day)	(tons/year)
SN-60 Bar Solder	0.012	1.5	9.00E-06	2.16E-04	3.94E-05
"44" Rosin Flux Cored Solder	0.012	1.5	9.00E-06	2.16E-04	3.94E-05
6045 Solder	0.001	1.5	7.50E-07	1.80E-05	3.29E-06
Potential Emission Rates			1.88E-05	4.50E-04	**8.21E-05**

Emission Rate, PM/PM10/Lead (lb/hr) = [Material Usage Rate (lb/hr) / 2,000 (b/ton)] * Emission Factor (lb/ton)
Emission Rate, PM/PM10/Lead (lb/day) = Emission Rate (lb/hr) * 24 (hrs/day)
Emission Rate, PM/PM10/Lead (tons/year) = Emission Rate (lb/hr) * 8,760 (hrs/year) * 1 / 2,000 (lbs/ton)

Material	Material Usage Rate	Density	VOC Content		VOC PTE		
	(lb/hr)	lb/gal	%	lb/gal	(lb/hr)	(lb/day)	(tons/year)
1544 Rosin Soldering Flux	0.0039	7.71	57%	4.40	0.002	0.05	**0.01**

Emission Rate, VOC (lb/hr) = Material Usage Rate (lb/hr) * Weight Percent VOC
Emission Rate, VOC (lb/day) = Material Usage Rate (lb/hr) * 24 (hr/day)
Emission Rate, VOC (tons/year) = Emission Rate (lb/hr) * 8,760 (hrs/year) * 1 / 2,000 (lbs/ton)

Notes: Lead emission factor from AP-42, Chapter 12.17 *Miscellaneous Lead Products* . Lead emissions presumed to be PM/PM10.
Potential Usage/Emissions based on 8760 hr/yr.

Appendix A: Emissions Calculations
Process Particulate Emissions
Woodworking Activities (WHA-WW)

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46516
Permit No. 039-23517-00220
Reviewer: JH/EVP

Uncontrolled Potential Emissions (tons/year)

DUST COLLECTOR WHA-DC1

Process	Process Rating (lb wood/hour)	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
CNC Router	200.00	1	0.001	9.46	624.00	99.00%	22.15
Relocated Class C Woodworking Equip	200.00	1	0.001	9.46	624.00	99.00%	22.15

Total Emissions Based on Rated Capacity at 8,760 Hours/Year (tons/year) **44.30**
Total Emissions Based on Rated Capacity (lb/hr) **10.11**

Controlled Potential Emissions (tons/year)

DUST COLLECTOR WHA-DC1

Process	Process Rating (lb wood/hour)	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
CNC Router	200.00	1	0.001	9.46	624.00	99.00%	0.22
Relocated Class C Woodworking Equip	200.00	1	0.001	9.46	624.00	99.00%	0.22

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (tons/year) **0.44**
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (lb/hr) **0.10**

Material Input Rate (lb/hr) = 400.0
Allowable Emission (lb/hr) = 4.10 X [Process Weight Rate] $^{0.67}$ = 1.39

Methodology:

Potential Emission (uncontrolled):

Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]
+ [Estimated Saw Dust from Uncontrolled Equipment (lb/hr) x 8,760 (hr/yr) x 1 ton/2,000 lbs]

Potential Emission (controlled):

Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]
+ [Estimated Saw Dust from Uncontrolled Equipment (lb/hr) x 8,760 (hr/yr) x 1 ton/2,000 lbs]

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class A, Line 1 Final Finish (A1FF)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Automotive Aerosol Primer 432-3UT	6.82	94.10%	37.20%	56.90%	38.38%	15.00%	0.00007	1.500	0.001	6.30	3.88	0.000	0.01	0.002	0.0001	50%	25.87	0.00002
BBQ Black (DAP,Inc)	6.67	90.04%	10.00%	80.04%	10.09%	9.12%	0.00018	1.500	0.002	5.94	5.34	0.001	0.03	0.01	0.000	50%	58.56	0.0001
Cyclo C-35 Rubberized Undercoating	9.34	57.25%	0.00%	57.25%	0.00%	26.25%	0.02096	1.500	0.29	5.35	5.35	0.17	4.04	0.74	0.27	50%	20.37	0.06
State Potential to Emit												**0.17**	**4.08**	**0.74**	**0.28**			**0.06**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Toluene**	**Weight % Xylene**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Automotive Aerosol Primer 432-3UT	6.82	0.00007	1.500	11.50%	0.00%	0.0003	0.00	0.0003
BBQ Black (DAP,Inc)	6.67	0.00018	1.500	20.00%	10.00%	0.002	0.001	0.002
Cyclo C-35 Rubberized Undercoating	9.34	0.02096	1.500	20.00%	0.00%	0.26	0.00	0.26
State Potential to Emit						0.26	0.001	0.26

METHODOLOGY

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

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class A, Line 1 Sub Assembly Operations (A1SA)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	99.90%	99.70%	0.20%	95.64%	0.85%	0.00462	1.500	0.06	0.37	0.02	0.00	0.00	0.00	0.00	100%	1.88	0.00
Anti Spatter (KCI, Inc.)	11.01	100.00%	100.00%	0.00%	96.95%	0.00%	0.00018	1.500	0.003	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
amie 22/90 Cleaner & Degreaser FCC0022	5.87	100.00%	0.00%	100.00%	0.00%	0.00%	0.00902	1.500	0.08	5.87	5.87	0.08	1.91	0.35	0.00	50%	N/A	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	100.00%	26.00%	74.00%	24.90%	0.00%	0.00435	1.500	0.04	6.24	4.68	0.03	0.73	0.13	0.00	50%	N/A	0.00
Cyclo C-37 Electric Motor Cleaner	13.51	100.00%	100.00%	0.00%	99.81%	0.00%	0.00161	1.500	0.03	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
SEM Self Etching Primer 39673	6.51	82.40%	0.00%	82.40%	18.46%	18.91%	0.00071	1.500	0.01	6.57	5.36	0.01	0.14	0.03	0.00	50%	28.34	0.00
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	99.00%	0.95%	98.05%	0.79%	0.75%	0.00013	1.500	0.001	5.47	5.42	0.00	0.03	0.00	0.00	50%	722.96	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	10.00%	0.00%	10.00%	0.00%	90.49%	0.00050	1.500	0.01	0.71	0.71	0.00	0.01	0.00	0.01	50%	0.79	0.00
WD-40	6.81	90.00%	3.00%	87.00%	4.86%	30.00%	0.01112	1.500	0.11	6.22	5.92	0.10	2.37	0.43	0.02	50%	19.74	0.01
State Potential to Emit												**0.22**	**5.19**	**0.95**	**0.04**			**0.01**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Ethyl Benzene**	**Weight % Methylene Chloride**	**Weight % Methanol**	**Weight % Napthalene**	**Weight % Tetrachloro ethylene**	**Weight % Toluene**	**Weight % Xylene**	**Ethyl Benzene Emissions (ton/yr)**	**Methylene Chloride Emissions (ton/yr)**	**Methanol Emissions (ton/yr)**	**Napthalene Emissions (ton/yr)**	**Tetrachloro ethylene Emissions (ton/yr)**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	0.00462	1.500	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	0.00
Anti Spatter (KCI, Inc.)	11.01	0.00018	1.500	0.00%	84.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.011
amie 22/90 Cleaner & Degreaser FCC0022	5.87	0.00902	1.500	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	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	0.00435	1.500	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.04
Cyclo C-37 Electric Motor Cleaner	13.51	0.00161	1.500	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.14
SEM Self Etching Primer 39673	6.51	0.00071	1.500	0.60%	0.00%	0.02%	0.45%	0.00%	10.60%	9.52%	0.0002	0.00	0.00001	0.0001	0.00	0.003	0.003	0.006
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	0.00013	1.500	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	0.00050	1.500	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	0.00
WD-40	6.81	0.01112	1.500	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	0.00
State Potential to Emit											0.0002	0.01	0.00001	0.0001	0.14	0.04	0.003	0.20

METHODOLOGY

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

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class A, Line 2 Final Finish (A2FF)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Automotive Aerosol Primer 432-3UT	6.82	94.10%	37.20%	56.90%	38.38%	15.00%	0.00007	1.000	0.0004	6.30	3.88	0.0003	0.01	0.001	0.0001	50%	25.87	0.00001
BBQ Black (DAP,Inc)	6.67	90.04%	10.00%	80.04%	10.09%	9.12%	0.00018	1.000	0.001	5.94	5.34	0.001	0.02	0.00	0.0003	50%	58.56	0.0001
Cyclo C-35 Rubberized Undercoating	9.34	57.25%	0.00%	57.25%	0.00%	26.25%	0.02096	1.000	0.20	5.35	5.35	0.11	2.69	0.49	0.18	50%	20.37	0.04
State Potential to Emit												**0.11**	**2.72**	**0.50**	**0.18**			**0.04**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Toluene**	**Weight % Xylene**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Automotive Aerosol Primer 432-3UT	6.82	0.00007	1.000	11.50%	0.00%	0.0002	0.00	0.0002
BBQ Black (DAP,Inc)	6.67	0.00018	1.000	20.00%	10.00%	0.001	0.001	0.002
Cyclo C-35 Rubberized Undercoating	9.34	0.02096	1.000	20.00%	0.00%	0.17	0.00	0.17
State Potential to Emit						0.17	0.001	0.17

METHODOLOGY

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

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class A, Line 2 Sub Assembly Operations (A2SA)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	99.90%	99.70%	0.20%	95.64%	0.85%	0.00462	1.000	0.04	0.37	0.02	0.00	0.00	0.00	0.00	100%	1.88	0.00
Anti Spatter (KCI, Inc.)	11.01	100.00%	100.00%	0.00%	96.95%	0.00%	0.00018	1.000	0.002	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
umie 22/90 Cleaner & Degreaser FCC0022	5.87	100.00%	0.00%	100.00%	0.00%	0.00%	0.00902	1.000	0.05	5.87	5.87	0.05	1.27	0.23	0.00	50%	N/A	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	100.00%	26.00%	74.00%	24.90%	0.00%	0.00435	1.000	0.03	6.24	4.68	0.02	0.49	0.09	0.00	50%	N/A	0.00
Cyclo C-37 Electric Motor Cleaner	13.51	100.00%	100.00%	0.00%	99.81%	0.00%	0.00161	1.000	0.02	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
SEM Self Etching Primer 39673	6.51	82.40%	0.00%	82.40%	18.46%	18.91%	0.00071	1.000	0.00	6.57	5.36	0.00	0.09	0.02	0.00	50%	28.34	0.00
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	99.00%	0.95%	98.05%	0.79%	0.75%	0.00013	1.000	0.001	5.47	5.42	0.00	0.02	0.00	0.00	50%	722.96	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	10.00%	0.00%	10.00%	0.00%	90.49%	0.00050	1.000	0.004	0.71	0.71	0.00	0.01	0.00	0.01	50%	0.79	0.00
WD-40	6.81	90.00%	3.00%	87.00%	4.86%	30.00%	0.01112	1.000	0.08	6.22	5.92	0.07	1.58	0.29	0.02	50%	19.74	0.00
State Potential to Emit												**0.14**	**3.46**	**0.63**	**0.03**			**0.01**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Ethyl Benzene**	**Weight % Methylene Chloride**	**Weight % Methanol**	**Weight % Napthalene**	**Weight % Tetrachloro ethylene**	**Weight % Toluene**	**Weight % Xylene**	**Ethyl Benzene Emissions (ton/yr)**	**Methylene Chloride Emissions (ton/yr)**	**Methanol Emissions (ton/yr)**	**Napthalene Emissions (ton/yr)**	**Tetrachloro ethylene Emissions (ton/yr)**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	0.00462	1.000	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	0.00
Anti Spatter (KCI, Inc.)	11.01	0.00018	1.000	0.00%	84.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.007
umie 22/90 Cleaner & Degreaser FCC0022	5.87	0.00902	1.000	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	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	0.00435	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.02
Cyclo C-37 Electric Motor Cleaner	13.51	0.00161	1.000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.10
SEM Self Etching Primer 39673	6.51	0.00071	1.000	0.60%	0.00%	0.02%	0.45%	0.00%	10.60%	9.52%	0.0001	0.00	0.00000	0.0001	0.00	0.002	0.002	0.004
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	0.00013	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	0.00050	1.000	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	0.00
WD-40	6.81	0.01112	1.000	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	0.00
State Potential to Emit											0.0001	0.01	0.00000	0.0001	0.10	0.03	0.002	0.13

METHODOLOGY

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

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class A - Line 2 (Diesel) Undercoating Bay
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Substrate	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Undercoating	Metal	8.30	56.27%	56.27%	0.00%	56.0%	44.00%	2.26	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%

Uncontrolled Potential Emissions	-	-	-	-
State Potential Emissions	-	-	-	-

Potential Emissions **Metal Coating** - - - -

***High Pressure Flow Coat Application**

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class C Final Finish (CFF)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Automotive Aerosol Primer 432-3UT	6.82	94.10%	37.20%	56.90%	38.38%	15.00%	0.00007	3.125	0.001	6.30	3.88	0.0008	0.02	0.003	0.0002	50%	25.87	0.00004
BBQ Black (DAP,Inc)	6.67	90.04%	10.00%	80.04%	10.09%	9.12%	0.00018	3.125	0.004	5.94	5.34	0.003	0.07	0.01	0.0008	50%	58.56	0.0002
Cyclo C-35 Rubberized Undercoating	9.34	57.25%	0.00%	57.25%	0.00%	26.25%	0.02096	3.125	0.61	5.35	5.35	0.35	8.41	1.53	0.57	50%	20.37	0.13
State Potential to Emit												**0.35**	**8.50**	**1.55**	**0.57**			**0.13**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Toluene**	**Weight % Xylene**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Automotive Aerosol Primer 432-3UT	6.82	0.00007	3.125	11.50%	0.00%	0.0007	0.00	0.0007
BBQ Black (DAP,Inc)	6.67	0.00018	3.125	20.00%	10.00%	0.003	0.002	0.005
Cyclo C-35 Rubberized Undercoating	9.34	0.02096	3.125	20.00%	0.00%	0.54	0.00	0.54
State Potential to Emit						0.54	0.002	0.54

METHODOLOGY

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

Appendix A to the TSD Addendum:
Emissions Calculations
VOC and PM/PM10 Emissions
Class C Sub Assembly Operations (CSA)
Metal Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 County Road 15, and 4221 Pine Creek Road, Elkhart, Indiana 46515**
Permit No. **039-23517-00220**
Reviewer: **JH/EVP**

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (Lb/Hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	Pounds VOC/gal Solids	PTE PM/PM10 (lbs/hour)
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	99.90%	99.70%	0.20%	95.64%	0.85%	0.00462	3.125	0.12	0.37	0.02	0.00	0.01	0.00	0.00	100%	1.88	0.00
Anti Spatter (KCI, Inc.)	11.01	100.00%	100.00%	0.00%	96.95%	0.00%	0.00018	3.125	0.006	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
mie 22/90 Cleaner & Degreaser FCC0022	5.87	100.00%	0.00%	100.00%	0.00%	0.00%	0.00902	3.125	0.17	5.87	5.87	0.17	3.97	0.73	0.00	50%	N/A	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	100.00%	26.00%	74.00%	24.90%	0.00%	0.00435	3.125	0.09	6.24	4.68	0.06	1.53	0.28	0.00	50%	N/A	0.00
Cyclo C-37 Electric Motor Cleaner	13.51	100.00%	100.00%	0.00%	99.81%	0.00%	0.00161	3.125	0.07	0.00	0.00	0.00	0.00	0.00	0.00	50%	N/A	0.00
SEM Self Etching Primer 39673	6.51	82.40%	0.00%	82.40%	18.46%	18.91%	0.00071	3.125	0.01	6.57	5.36	0.01	0.29	0.05	0.01	50%	28.34	0.00
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	99.00%	0.95%	98.05%	0.79%	0.75%	0.00013	3.125	0.002	5.47	5.42	0.00	0.05	0.01	0.00	50%	722.96	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	10.00%	0.00%	10.00%	0.00%	90.49%	0.00050	3.125	0.01	0.71	0.71	0.00	0.03	0.00	0.02	50%	0.79	0.00
WD-40	6.81	90.00%	3.00%	87.00%	4.86%	30.00%	0.01112	3.125	0.24	6.22	5.92	0.21	4.94	0.90	0.05	50%	19.74	0.01
State Potential to Emit												**0.45**	**10.81**	**1.97**	**0.08**			**0.02**

** Coating applied using aerosol spray application and manual cleaning.

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)
Pounds VOC per Gallon of Solids = [Density (lb/gal) * Weight % Organics] / (Volume % Solids)
PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

HAZARDOUS AIR POLLUTANTS

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Ethyl Benzene**	**Weight % Methylene Chloride**	**Weight % Methanol**	**Weight % Napthalene**	**Weight % Tetrachloro ethylene**	**Weight % Toluene**	**Weight % Xylene**	**Ethyl Benzene Emissions (ton/yr)**	**Methylene Chloride Emissions (ton/yr)**	**Methanol Emissions (ton/yr)**	**Napthalene Emissions (ton/yr)**	**Tetrachloro ethylene Emissions (ton/yr)**	**Toluene Emissions (ton/yr)**	**Xylene Emissions (ton/yr)**	**Total HAP Emissions (ton/yr)**
Alodine 5700 (Adhesive Primer, Aluminum)	8.00	0.00462	3.125	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	0.00
Anti Spatter (KCI, Inc.)	11.01	0.00018	3.125	0.00%	84.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.023
mie 22/90 Cleaner & Degreaser FCC0022	5.87	0.00902	3.125	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	0.00
Cyclo C-111 Brake & Parts Cleaner	6.33	0.00435	3.125	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.08
Cyclo C-37 Electric Motor Cleaner	13.51	0.00161	3.125	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.30
SEM Self Etching Primer 39673	6.51	0.00071	3.125	0.60%	0.00%	0.02%	0.45%	0.00%	10.60%	9.52%	0.0004	0.00	0.00001	0.0003	0.00	0.007	0.006	0.013
raying TFE Dry Lube-S708 (Sherwin-Willia	5.53	0.00013	3.125	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ray-On Cutting Oil S00208 (Sherwin-Willia	7.13	0.00050	3.125	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	0.00
WD-40	6.81	0.01112	3.125	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	0.00
State Potential to Emit											0.0004	0.02	0.00001	0.0003	0.30	0.08	0.006	0.41

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