



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: March 22, 2007  
RE: Starcraft RV, Inc. - Topeka / 087-23735-00007  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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Indianapolis, Indiana 46204-2251  
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## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Starcraft RV, Inc.-Topeka  
536 Michigan Street  
Topeka, Indiana 46571**

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

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

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 2-7 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.

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.

Operation Permit No.: F087-23735-00007	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 22, 2007  Expiration Date: March 22, 2012

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## SECTION A SOURCE SUMMARY

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

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The Permittee owns and operates a stationary recreational vehical (trailer and camper) assembly plant.

Source Address:	536 Michigan Street, Topeka, Indiana 46571
Mailing Address:	P.O. Box 458, Topeka, IN 46571
General Source Phone Number:	(260) 593-2550
SIC Code:	3792
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.
- (b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.
- (c) One (1) roller and dip stain coating, supporting a maximum source capacity of four and five-tenths (4.5) vehicles per hour, identified as EU-C, constructed in 1964, using no controls, utilized for wood and plastic substrates, equipped for roller and wipe methods of application, and exhausting to one (1) stack, identified as Stack 5.
- (d) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, identified as EU-D, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using no controls, using the aerosol can, roller and wipe methods of application, and exhausting to general ventilation in Building 1.

- (e) One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.
  
- (f) Four (4) woodworking shops, described as follows:
  - (1) Shop 1, constructed in 1964, with a maximum capacity of 3,130 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 6;
  - (2) Shop 2, constructed in 1968, with a maximum capacity of 565 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 9;
  - (3) Shop 3, constructed in 1988, with a maximum capacity of 295 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 10; and
  - (4) Shop 4, constructed in 2001, with a maximum capacity of 100 pounds of wood per hour, using a bag filter system for particulate control, and exhausting inside the building and then to general ventilation.
  
- (g) Two (2) touchup and repair paint booths, described as follows:
  - (1) Repair Booth 3 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 2003, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-33, and consisting of the following equipment: one (1) air atomized spray paint gun.
  - (2) Repair Booth 4 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 1999, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-28, and consisting of the following equipment:
    - (A) two (2) paint pots;
    - (B) one (1) air atomized wash gun;
    - (C) five (5) air atomized cup paint guns, identified as PGRV-001 through PGRV-005; and
    - (D) one (1) wash tank for the cup paint guns.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) natural gas-fired boiler with maximum heat input capacities of 0.439 MMBtu/hr.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: woodworking and machining operations separate from Woodworking Shops 1 through 4.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Various heating units;
  - (2) Three (3) natural gas-fired air make-up units, identified as AM-1, AM-2, and AM-3, with maximum heat input capacities of 4.9, 2.0, and 2.0 MMBtu/hr, respectively;
  - (3) Six (6) natural gas-fired thermo cycler heaters, identified as H-33, H-34, H-35, H-36, H-37 and H-38, each with a maximum heat input capacity of 0.5 MMBtu/hr, exhausting to stacks identified as H-33, H-34, H-35, H-36, H-37 and H-38; and
  - (4) Four (4) natural gas-fired radiant tube heaters, identified as H-39, H-40, H-41 and H-42, each with a maximum heat input capacity of 0.2 MMBtu/hr, exhausting to stacks identified as H-39, H-40, H-41 and H-42.
- (f) 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.
- (g) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM: Wash bay with spray wand for washing RV units, using water and detergent.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

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

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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)]

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- (a) This permit, F087-23735-00007, 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]

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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]

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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)]

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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)]

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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)]

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

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

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

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

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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.

And

Northern Regional Office  
220 W. Colfax Avenue., Ste 200  
South Bend, Indiana 46601-1634

- (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 F087-23735-00007 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]

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- (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)]**

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- (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]**

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- (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]**

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- (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  
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]**

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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]**

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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]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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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]

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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]

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

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

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- (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.8 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

## **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

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

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

---

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

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

---

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

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

### **C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

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; and/or
  - (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 [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

**C.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]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.
- (b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.
- (c) One (1) roller and dip stain coating, supporting a maximum source capacity of four and five-tenths (4.5) vehicles per hour, identified as EU-C, constructed in 1964, using no controls, utilized for wood and plastic substrates, equipped for roller and wipe methods of application, and exhausting to one (1) stack, identified as Stack 5.
- (d) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, identified as EU-D, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using no controls, using the aerosol can, roller and wipe methods of application, and exhausting to general ventilation in Building 1.
- (e) One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.
- (g) Two (2) touchup and repair paint booths, described as follows:
  - (1) Repair Booth 3 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 2003, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-33, and consisting of the following equipment: one (1) air atomized spray paint gun.
  - (2) Repair Booth 4 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 1999, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-28, and consisting of the following equipment:
    - (A) two (2) paint pots;

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

**Emissions Unit Description: (Continue)**

- (B) one (1) air atomized wash gun;
- (C) five (5) air atomized cup paint guns, identified as PGRV-001 through PGRV-005; and
- (D) one (1) wash tank for the cup paint guns.

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

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

**D.1.1 Volatile Organic Compounds (VOC) Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]**

The VOC usage at the coating operations EU-A, EU-B, EU-C, and EU-D and repair booths 3 and 4 including the dilution solvents and cleaning solvents shall be limited to 74.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit in conjunction with VOC emissions from the other VOC emission units, shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Operating Permit) and 326 IAC 2-2 (PSD) do not apply.

**D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR 63, Subpart PPPP]**

Any single HAP and any combination of HAPs delivered to the coating operations EU-A, EU-B, EU-C, EU-D and repair booths 3 and 4 and hot melt glue operation including dilution and clean-up solvents shall be limited to less than 9.89 tons and less than 24.89 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

Compliance with these HAP usage limitations, in conjunction with HAP emissions from the other HAP emission units, shall limit HAP emissions from the entire source to less than 10 tons and 25 tons of any single HAP and combined HAPs, respectively, per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 and 40 CFR 63, Subpart PPPP not applicable.

**D.1.3 Volatile Organic Compounds (VOC) Limitation (326 IAC 8-1-6)**

The VOC usage including clean up solvent delivered to the applicators of the hot melt glue operation shall be limited to less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

**D.1.4 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2 (d), the dry filters shall be in operation at all times while the associated surface coating or repair operation is in operation, in accordance to manufacturer's specifications.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the above facility and the associated control devices.

## Compliance Determination Requirements

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

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- (a) Compliance with the VOC content and HAP 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

### D.1.7 Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1, 2, 3, 4, 7, SV28, and SV33) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

### D.1.8 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Condition D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAPs usage of each coating material and solvent used;
  - (2) A log of the dates of use;
  - (3) The amount of coating material and solvent less water used on monthly basis.
    - (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;
  - (4) The coating materials including cleanup solvent usage for each month;

- (5) The total VOC and HAPs usage and VOC usage at the hot melt glue operation, including clean up solvents for each month;
- (6) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (f) Four (4) woodworking shops, described as follows:
- (1) Shop 1, constructed in 1964, with a maximum capacity of 3,130 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 6;
  - (2) Shop 2, constructed in 1968, with a maximum capacity of 565 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 9;
  - (3) Shop 3, constructed in 1988, with a maximum capacity of 295 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 10; and
  - (4) Shop 4, constructed in 2001, with a maximum capacity of 100 pounds of wood per hour, using a bag filter system for particulate control, and exhausting inside the building and then to general ventilation.

### Insignificant Activities:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: woodworking and machining operations separate from Woodworking Shops 1 through 4.

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

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

#### D.2.1 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) PM-10 emissions from shop 1 shall not exceed 11.5 pounds per hour.
- (b) PM-10 emissions from shop 2 shall not exceed 3.2 pounds per hour.
- (c) PM-10 emissions from shop 3 shall not exceed 1.7 pounds per hour.
- (d) PM-10 emissions from shop 4 shall not exceed 0.58 pounds per hour.

Compliance with these limits in conjunction with PM-10 emissions from the other PM-10 units at this source shall limit the source-wide potential to emit of PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitation):

- (a) PM emissions from woodworking shop 1 shall not exceed 5.53 pounds per hour when operating at a process weight rate of 3130 pounds per hour,
- (b) PM emissions from woodworking shop 2 shall not exceed 1.76 pounds per hour when operating at a process weight rate of 565 pounds per hour,
- (c) PM emissions from woodworking shop 3 shall not exceed 1.14 pounds per hour when operating at a process weight rate of 295 pounds per hour.
- (d) PM emissions from woodworking shop 4 shall not exceed 0.55 pounds per hour when operating at a process weight rate of 100 pounds per hour.

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

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

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

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

#### D.2.3 Particulate Matter (PM) [326 IAC 2-2]

---

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration):

- (a) PM emissions from woodworking shop 1 shall be less than 31.2 pounds per hour.
- (b) PM emissions from woodworking shop 2 shall be less than 8.7 pounds per hour.
- (c) PM emissions from woodworking shop 3 shall be less than 4.6 pounds per hour.
- (d) PM emissions from woodworking shop 4 shall be less than 1.6 pounds per hour.

Compliance with these limits in conjunction with PM emissions from the other PM units at this source shall ensure that source-wide PM emissions are less than 250 tons per year, rendering 326 IAC 2-2 not applicable.

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### D.2.5 Particulate Control

---

In order to comply with Condition D.2.1, D.2.2 and D.2.3, the bag filter and cyclones for particulate control shall be in operation at all times when the associated woodworking shops and insignificant woodworking operations are in operation and exhausting to the atmosphere.

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

#### D.2.6 Visible Emissions Notations

---

- (a) Daily visible emission notations of the woodworking shops stacks 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.2.7 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

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

#### D.2.8 Broken Bag or Failure Detection

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)]**

#### D.2.9 Record Keeping Requirements

---

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stacks 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 2-7-5(15)]: Insignificant activities:**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) natural gas-fired boiler with a maximum heat input capacity of 0.439 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(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.3.1 Particulate Matter (PM) [326 IAC 6-2-3]**

---

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the natural gas fired boiler shall not exceed eight-tenths (0.8) pounds per million British thermal units (MMBTU).

##### **D.3.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

---

Pursuant to 326 IAC 6-3-2, the combined particulate emissions from any insignificant brazing equipment, cutting torches, soldering equipment, or welding equipment shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, based on a process weight rate of less than 100 pounds per hour.

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

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

Source Name: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007

**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: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007  
Facility: All Coating Operations EU-A, EU-B, EU-C, EU-D, Repair booths 3 and 4  
Parameter: VOC  
Limit: 74.6 tons per twelve consecutive month period

**Year:** \_\_\_\_\_

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
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: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007  
Facility: The coating operations and hot melt glue operation  
Parameter: Single HAP  
Limit: less than 9.89 tons per twelve consecutive month period

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007  
Facility: The coating operations and hot melt glue operation  
Parameter: Combined HAPs  
Limit: less than 24.89 tons per twelve consecutive month period

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007  
Facility: The hot melt glue operation  
Parameter: VOC  
Limit: less than 25 tons per twelve consecutive month period

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Starcraft RV, Inc.-Topeka  
Source Address: 536 Michigan Street, Topeka, Indiana 46571  
Mailing Address: P.O. Box 458, Topeka, IN 46571  
FESOP Permit No.: F087-23735-00007

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

<p>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 ΔNo deviations occurred this reporting period@.</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

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 for Federally Enforceable State Operating Permit  
(FESOP)

**Starcraft RV, Inc.-Topeka  
536 Michigan Street  
Topeka, Indiana 46571**

**F087-23735-00007**

On February 12, 2007 the Office of Air Quality (OAQ) had a notice published in The LaGrange Standard, LaGrange, Indiana 46761, stating that Starcraft RV, Inc.-Topeka, had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary recreational vehicle (trailer and camper) assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 28, 2007 a Starcraft RV, Inc.-Topeka representative commented on the proposed FESOP No. F087-23735-00007.

Comment No. 1: The unlimited potential to emit of VOC of 413.7 tons in the Appendix to the TSD appears to be too high.

Response No 1: Upon further review, IDEM, OAQ has determined that the previous calculation of potential to emit of VOC (unlimited) in TSD, Appendix A needs to be revised due to an error in the method of calculation. IDEM, OAQ does not make any changes to the TSD, since the TSD is a support document for the permit that was on public notice. However, the revised calculations are noted in this Addendum to the TSD. The new calculation sheet is attached as Appendix A to this Addendum. The limited VOC PTE remains unchanged.

The revised unlimited PTE for the entire source is documented as follows:

Pollutant	Potential to Emit (tons/yr)
PM	>250
PM-10	>250
SO <sub>2</sub>	--
VOC	>100 < 250
CO	5
NO <sub>x</sub>	6
Single HAP	> 10
Total HAPs	> 25

This change will not affect the potential to emit after issuance and it will not affect the conditions in the permit.

**Appendix A: Emission Calculations**  
**VOC and PM emissions: Surface Coating Operations**

**Company Name: Starcraft RV**  
**Address: 536 Michigan Street, Topeka, Indiana**  
**FESOP: 087-23735-00007**  
**Reviewer: Lek R. Traivaranon**  
**Date: March 12, 2007**

Material ID Number	Material Density (lbs/gal)	Weight Percent Solids (%)	Weight Percent VOC (%)	VOC (lbs/gal)	Usage (gal/unit)	Maximum Throughput (units/hr)	PTE VOC (lbs/hr)	PTE VOC (tons/yr)	PTE PM/PM10 Before Controls (tons/yr)	Control Efficiency %	PTE PM/PM10 After Controls (tons/yr)
WB Tan	8.59	32.5%	19.0%	1.63	0.1450	26.5	6.27	27.47	46.99	80%	9.40
WB Black	8.40	32.5%	17.9%	1.50	0.0890	26.5	3.55	15.53	28.20	80%	5.64
WB White	9.05	28.2%	10.1%	0.91	0.0220	26.5	0.53	2.33	6.52	80%	1.30
DBE	9.10	0.0%	100%	9.10	0.0990	4.5	4.05	17.8	0.00	NA	0
RAABE	8.50	11.0%	89.0%	7.57	0.0013	4.5	0.04	0.19	0.02	80%	0.00
T30B	8.00	0.0%	100%	8.00	0.0060	4.5	0.22	0.95	0.00	NA	0
999 Silcn	8.66	95.0%	5.0%	0.43	0.2500	4.5	0.49	2.13	40.54	80%	8
924 Floor	8.00	97.0%	3.0%	0.24	0.4200	4.5	0.45	1.99	64.24	80%	13
Mor Ad 647	9.25	100%	0.0%	0.00	0.0026	4.5	0.00	0.00	0.47	80%	0
Tile R Bond	11.16	1.0%	98.9%	11.04	0.0016	4.5	0.08	0.35	0.00	80%	0
Wood Glue	9.16	50.7%	1.0%	0.09	0.3540	4.5	0.15	0.64	32.40	80%	6
CL Metric	9.16	63.0%	37.0%	3.39	0.0122	4.5	0.19	0.81	1.39	80%	0
CL MT 45030	9.16	98.0%	2.0%	0.18	0.0220	4.5	0.02	0.08	3.89	80%	1
Epoxy A	14.00	93.0%	7.0%	0.98	0.2250	4.5	0.99	4.35	57.74	80%	12
Epoxy B	14.00	91.0%	9.0%	1.26	0.2320	4.5	1.32	5.76	58.26	80%	12
676 Adhesive	5.70	30.8%	69.2%	3.94	0.1280	4.5	2.27	9.95	4.43	80%	1
1013 Adhesive	7.25	54.0%	46.0%	3.34	0.2540	4.5	3.81	16.7	19.60	80%	4
777 Adhesive	9.90	81.6%	18.4%	1.82	0.2400	4.5	1.97	8.62	38.21	80%	8
RL SL 8011	8.50	100%	0.0%	0.00	0.3100	4.5	0.00	0.00	51.94	80%	10
9625	8.90	95.0%	5.0%	0.45	0.4400	4.5	0.88	3.86	73.33	80%	15
Oatey Abs	7.08	25.0%	75.0%	5.31	0.0200	4.5	0.48	2.09	0.70	80%	0
Lac Thinner	6.80	0.0%	100%	6.80	0.0750	4.5	2.30	10.1	0.00	NA	0
Methylene Chl	11.15	100%	0.0%	0.00	0.0500	4.5	0.00	0.00	10.99	80%	2
Mineral Spirits	6.40	0.0%	100%	6.40	0.0140	4.5	0.40	1.77	0.00	NA	0
<b>TOTALS</b>							<b>115.5</b>	<b>539.9</b>			<b>107.97</b>

**Methodology**

PTE VOC (tons/yr) = Density (lbs/gal) x Usage (gals/unit) x Max. Throughput (units/hr) x Weight % VOC x 8760 hrs/yr x 1 ton/2,000 lbs

PTE VOC = the worst case coating used (WB tan coating) + all solvents/adhesives, etc.

Total RV painting capacity = 4.5 \* 5 (coating) + 4 (repair only) = 26.5 units/hr

PTE PM/PM10 Before Controls (tons/yr) = Density (lbs/gal) x Usage (gals/unit) x Max. Throughput (units/hr) x Weight % Solids x 8760 hrs/yr x 1 ton/2,000 lbs

PTE PM/PM10 After Controls (tons/yr) = PTE PM/PM10 Before Controls (tons/yr) x (1- Control Efficiency)

PTE HAPs (tons/yr) = Annual HAPs (lbs/yr) x 8760/2138 ((hrs/yr)/(hrs of operation/yr)) x 1 ton/2000 lbs

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Starcraft RV, Inc.-Topeka</b>
<b>Source Location:</b>	<b>536 Michigan Street, Topeka, IN 46571</b>
<b>County:</b>	<b>LaGrange</b>
<b>SIC Code:</b>	<b>3792</b>
<b>Operation Permit No.:</b>	<b>T087-17614-00007</b>
<b>Operation Permit Issuance Date:</b>	<b>December 4, 2006</b>
	<b>Transitioning from TVOP to FESOP</b>
<b>Permit No.:</b>	<b>F087-23735-00007</b>
<b>Permit Reviewer:</b>	<b>Lek R. Traivaranon</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Starcraft RV, Inc. -Topeka relating to the operation of stationary recreational vehicle (trailer and camper) assembly plant.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.
- (b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.
- (c) One (1) roller and dip stain coating, supporting a maximum source capacity of four and five-tenths (4.5) vehicles per hour, identified as EU-C, constructed in 1964, using no controls, utilized for wood and plastic substrates, equipped for roller and wipe methods of application, and exhausting to one (1) stack, identified as Stack 5.
- (d) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, identified as EU-D, constructed in 1964, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using no controls, using the aerosol can, roller and wipe methods of application, and exhausting to general ventilation in Building 1.

- (e) One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for four and five-tenths (4.5) vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.
- (f) Four (4) woodworking shops, described as follows:
  - (1) Shop 1, constructed in 1964, with a maximum capacity of 3,130 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 6;
  - (2) Shop 2, constructed in 1968, with a maximum capacity of 565 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 9;
  - (3) Shop 3, constructed in 1988, with a maximum capacity of 295 pounds of wood per hour, using a cyclone for particulate control, and exhausting to one (1) stack, identified as Stack 10; and
  - (4) Shop 4, constructed in 2001, with a maximum capacity of 100 pounds of wood per hour, using a bag filter system for particulate control, and exhausting inside the building and then to general ventilation.
- (g) Two (2) touchup and repair paint booths, described as follows:
  - (1) Repair Booth 3 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 2003, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-33, and consisting of the following equipment: one (1) air atomized spray paint gun.
  - (2) Repair Booth 4 for coating of travel trailer exteriors (predominantly fiberglass substrates), constructed in 1999, with a maximum capacity of 2.0 recreational vehicles (RVs) per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-28, and consisting of the following equipment:
    - (A) two (2) paint pots;
    - (B) one (1) air atomized wash gun;
    - (C) five (5) air atomized cup paint guns, identified as PGRV-001 through PGRV-005; and
    - (D) one (1) wash tank for the cup paint guns.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) natural gas-fired boiler with maximum heat input capacities of 0.439 MMBtu/hr.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: woodworking and machining operations separate from Woodworking Shops 1 through 4.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Various heating units;
  - (2) Three (3) natural gas-fired air make-up units, identified as AM-1, AM-2, and AM-3, with maximum heat input capacities of 4.9, 2.0, and 2.0 MMBtu/hr, respectively;
  - (3) Six (6) natural gas-fired thermo cycler heaters, identified as H-33, H-34, H-35, H-36, H-37 and H-38, each with a maximum heat input capacity of 0.5 MMBtu/hr, exhausting to stacks identified as H-33, H-34, H-35, H-36, H-37 and H-38; and
  - (4) Four (4) natural gas-fired radiant tube heaters, identified as H-39, H-40, H-41 and H-42, each with a maximum heat input capacity of 0.2 MMBtu/hr, exhausting to stacks identified as H-39, H-40, H-41 and H-42.
- (f) 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.
- (g) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day  
PM: Wash bay with spray wand for washing RV units, using water and detergent.

### Existing Approvals

The source has been operating under the previous Title V Renewal No. 087-17614-00007 issued on December 4, 2006. Per source's request dated October 6, 2006, the following emission units have been removed from the source and have been deleted from the permit.

- (1) The Repair Booth 1, constructed in 2001, exhausting through Stacks SV-30, SV-31, and SV-32;
- (2) One (1) natural gas-fired boiler with maximum heat input capacity of 1.19 MMBtu/hr.

In addition, the following change was made:

- (3) The descriptions of “one (1) roller and stain coating operation.....and exhausting to two (2) stacks, identified as Stacks 5 and 8” were changed to “Roller and dip stain coating,....., and exhausting to one (1) stack, identified as Stack 5”.

The source has opted to transition to a FESOP and has opted to limit source wide single and combined HAP emissions to below 10 and 25 tons per year, respectively, and source wide VOC and source wide PM-10 emissions to less than 100 tons per year.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on October 6, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 5)

### Potential to Emit

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

Pollutant	Potential to Emit (tons/yr)
PM	>250
PM-10	>250
SO <sub>2</sub>	--
VOC	>250
CO	5
NO <sub>x</sub>	6
Single HAP	> 10
Total HAPs	> 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

And

- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**Potential to Emit After Issuance**

The source has opted to transition from a Part 70 source to a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the previous Part 70 Permit, except for emission removed from the source as described in section titled "existing approvals" in this document.

Process / Emission Unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating (EU-A)	21.9	14.6 <sup>(c)</sup>	0	74.6 <sup>(c)</sup>	0	0	<9.89 <sup>(c)</sup>
Surface Coating (EU-B)							
Surface Coating (EU-D)							
Roller and Dip Coating (EU-C)							
Repair Booth 3	1.56	1.56	0	0	0		
Repair Booth 4	1.56	1.56	0	0	0		
Hot Melt Glue (EU-E)	0 <sup>(a)</sup>	0 <sup>(a)</sup>	0	<25 <sup>(b)</sup>	0	0	
Woodworking Shop 1	136.75	50.4 <sup>(c)</sup>	0	0	0	0	0
Woodworking Shop 2	38.25	14.0 <sup>(c)</sup>	0	0	0	0	0
Woodworking Shop 3	20.25	7.4 <sup>(c)</sup>	0	0	0	0	0
Woodworking Shop 4	6.9	2.5 <sup>(c)</sup>	0	0	0	0	0
Combustion	0.11	0.43	0.034	0.31	4.74	5.64	0.11

Process / Emission Unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Insignificant Woodworking	14.9	7.45 <sup>(c)</sup>	0	0	0	0	0
Total PTE	<250 <sup>(d)</sup>	<100	0.034	<100	4.74	5.64	<25

- (a) The hot glue melt operations do not create particulate emissions.
- (b) The input of VOC including clean up solvent is limited to less than 25 tons/yr, in order to render 326 IAC 8-1-6 not applicable.
- (c) Emissions are limited to comply with FESOP.
- (d) The PM emissions from woodworking shops 1 through 4 have been based on PM emissions limitations, in order to keep the source PSD minor under 326 IAC 2-2.

### County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8 hr. Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) LaGrange County has been classified as attainment or unclassifiable for all other Criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	<250
PM-10	<100
SO <sub>2</sub>	
VOC	
CO	
NO <sub>x</sub>	
Single HAP	<10
Combination HAPs	<25

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

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
  - (1) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12) are not included in this permit for this source. The source does not apply polymeric coatings as defined in 40 CFR 60.741.
  - (2) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for natural gas-fired boiler. The boiler has a maximum heat input capacity less than 10 MMBtu/hr.
- (b) The requirements of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Surface Coating of Plastic Parts and Products) are not included in this permit because the source limited the usage of HAPs to less than 10 and 25 tons per year of single HAP and combined HAPs, respectively.
- (c) This source is not subject to the requirements of 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters) and 326 IAC 20 because the source limited the usage of HAPs to less than 10 and 25 tons per year of single HAP and combined HAPs, respectively.
- (d) The requirements of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products) are not included in this permit for this source, because they do not perform surface coating of metal parts.
- (e) The requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Reinforced Plastic Composites Production) are not included in this permit for this source. The source does not manufacture reinforced plastic composites.
- (f) The requirements of 40 CFR Part 63, Subpart JJ (National Emission Standard for Surface Coating of Wood Furniture) are not included in this permit for this source. The products manufactured at the source do not meet the definition of wood furniture or wood furniture components as listed at 40 CFR 63.801. Subpart JJ defines wood furniture as

“any product made of wood...that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.” A wood furniture component is defined as “any part that is used in the manufacture of wood furniture.” This source’s operation is described by standard industrial classification (SIC) code 3792, Travel Trailers and Campers. SIC Code 3792 is not listed in the definition of wood furniture.

- (g) The requirements of 40 CFR Part 63, Subpart QQQQ (National Emission Standard for Surface Coating of Wood Building Products) are not included in this permit for this source. The wood products coated at the source do not meet the definition of wood building products as listed at 40 CFR 63.4781. Subpart QQQQ defines wood building products as “any product that contains more than 50 percent by weight wood or wood fiber...and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building.” This source’s wood products are not used in the construction of any type of building.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980; therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD.

This source was constructed in 1964 and modified in 1968. The emission units in existence in 1968 included EU-A, EU-B, EU-C, EU-D, Shop 1, and Shop 2. At the time that the PSD rules were promulgated in the 1970s, the potential to emit of PM and PM10 of the entire source before controls was greater than 250 tons per year. However, the source was required to operate cyclones on the woodworking operations in order to control particulate emissions and the actual emissions of PM and PM10 were below the PSD threshold of 250 tons per year. At the time that the PSD rules were promulgated in the 1970s, the potential to emit of VOC of the entire source was less than 250 tons per year.

In 1988, the source added Shop 3. The potential to emit of PM and PM10 of this woodworking operation before controls is 81 tons per year. Although this modification would have triggered PSD review, the actual emissions after controls were much less than the PSD threshold of 250 tons per year for the entire source. The source was required by the permit to operate the particulate control device at all times the woodworking operations were in operation. The potential to emit of VOC of the entire source after this modification remained less than 250 tons per year.

The source was modified in 1999, 2000 and 2003, but these modifications did not trigger PSD reviews. On December 4, 2006, the source was issued operation permit renewal T087-17614-00007. The Technical Support Document for that permit lists the total source potential to emit as less than 250 tons per year for PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, NO<sub>x</sub>, and CO and the source was classified as a PSD minor source.

On October 6, 2006, the source submitted a permit transition application to operate as a FESOP and the potential to emit of the entire source, after limits is less than 250 tons per year for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC. Therefore, the source is a minor source under PSD with the following PM emissions limits:

- (a) PM emissions from woodworking shop 1 shall be less than 31.2 pounds per hour.
- (b) PM emissions from woodworking shop 2 shall be less than 8.7 pounds per hour.

- (c) PM emissions from woodworking shop 3 shall be less than 4.6 pounds per hour.
- (d) PM emissions from woodworking shop 4 shall be less than 1.6 pounds per hour.

#### 326 IAC 2-8-4 (FESOP) and 326 IAC 2-7 (Operating Permit)

- (a) The potential to emit of PM-10 is greater than 100 tons per year but the source shall limit the PM-10 emissions from the woodworking activities as follows:
  - (1) PM-10 emissions from shop 1 shall not exceed 11.5 pounds per hour.
  - (2) PM-10 emissions from shop 2 shall not exceed 3.2 pounds per hour.
  - (3) PM-10 emissions from shop 3 shall not exceed 1.7 pounds per hour.
  - (4) PM-10 emissions from shop 4 shall not exceed 0.58 pounds per hour.

Compliance with above limits in conjunction with PM-10 emissions from other emission units shall limit PM-10 emissions from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

- (b) The VOC usage at the coating operation operations EU-A, EU-B, EU-C, EU-D and repair booths 3 and 4 including the dilution solvents and cleaning solvents shall be limited to 74.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit in conjunction with VOC emissions from all other VOC emission units, shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (c) The potential to emit of a single HAP is greater than 10 tons per year and the combination of HAPs is greater than 25 tons per year. However, the single HAP and combination of HAPs delivered to the coating operations EU-A, EU-B, EU-C, EU-D and repair booths 3 and 4 and the hot melt glue operation EU-E including dilution and clean-up solvents are limited to less than 9.89 tons and less than 24.89 tons per 12 consecutive month period, respectively, with compliance determined at the end of each month.

The HAPs usage limitations, in conjunction with the potential to emit of HAPs from the combustion, shall limit the HAP emissions from the entire source to less than 10 tons of any single HAP and less than 25 tons of any combination of HAPs, per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 not applicable.
- (d) The potential to emit of each of the remaining criteria pollutants, NO<sub>x</sub>, SO<sub>2</sub>, CO, is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

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

The source has limited the single and combined HAPs emissions to less than 10 and 25 tons per year, therefore, the requirements of 326 IAC 2-4.1 do not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in LaGrange County and will be operating under a FESOP, therefore, the requirements of 326 IAC 2-6 do not apply to the source.

### 326 IAC 5-1 (Opacity Limitations)

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

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

### 326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not located in a county listed in 326 IAC 6-5-1(a). Although this source was issued a construction permit in 1999, the source did not add a facility with the potential to emit fugitive particulate matter. Therefore, pursuant to 326 IAC 6-5-1, this source is not subject to the requirements of 326 IAC 6-5.

### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Surface coating operations EU-A, EU-B, EU-C, and EU-D were constructed, and commenced operation, before the applicability timeframe (October 7, 1974 and January 1, 1980) of this rule. Therefore, those facilities are not subject to the requirements of 326 IAC 8-6.

## **State Rule Applicability – Surface Coating**

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating of wood (EU-A), the paint spray coating of wood and fiberglass (EU-B), and Repair Booths 3 and 4 shall be controlled by dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

The adhesive extrusion methods used in the hot melt glue operations (EU-E) do not create particulate matter. Therefore, the hot melt glue operation (EU-E) is not subject to 326 IAC 6-3-2.

### 326 IAC 8-1-6 (VOC Limitation for New Facilities)

The input of VOC including clean up solvent delivered to the applicators of the hot melt glue operation (EU-E) shall be limited to less than 25 tons per year, with compliance determined at the end of the month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 not applicable.

The surface coating operations identified as EU-A, EU-B, EU-C and EU-D were constructed before January 1, 1980; therefore, they are not subject to the requirements of 326 IAC 8-1-6 (BACT).

Repair Booths 3 and 4 were each constructed after January 1, 1980, but each have the potential to emit less than 25 tons of VOC per year; therefore, they are not subject to the requirements of 326 IAC 8-1-6.

#### 326 IAC 8-2 (Surface Coating Emission Limitations)

The surface coating operations identified as EU-A, EU-B, EU-C and EU-D are not subject to any of the emission limitations in 326 IAC 8-2 because they are at a source located in LaGrange County and were constructed before January 1, 1980.

The hot melt glue operation (EU-E) and Repair Booths 3 and 4 are not subject to any of the emission limitations in 326 IAC 8-2 because they were constructed after July 1, 1990 and do not perform operations of the types described in Sections 2 through 13 of 326 IAC 8-2. These operations do not apply surface coatings to metal, wood furniture or cabinets. These operations apply coatings to the exterior fiberglass surfaces of assembled travel trailers.

#### State Rule Applicability – Woodworking

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

Pursuant to 326 IAC 6-3-2, the particulate from each of the four woodworking shops (Shops 1 through 4) 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:

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

Using the above equation, the particulate from these operations shall not exceed:

Facility	PM limit (lb/hr)	Process Weight Rate (tons/hr)
Woodworking shop 1	5.53	1.56
Woodworking shop 2	1.76	0.282
Woodworking shop 3	1.14	0.147
Woodworking shop 4	0.551	0.05

The cyclones shall be in operation at all times Shops 1, 2 and 3 are in operation in order to comply with these limits. The bag filter shall be in operation at all times Shop 4 is in operation in order to comply with these limits.

#### State Rule Applicability – Insignificant Facilities - Boilers

##### 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

The insignificant natural gas-fired boiler is subject to the requirements of 326 IAC 6-2-3 because the source is located in LaGrange County and the boiler was constructed prior to September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from the boiler shall not exceed the pound per million Btu limit (Pt) calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where C = 50 u/m<sup>3</sup>

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

Q = total source maximum operating capacity rating (Q = 1.629 MMBtu/hr)

N = number of stacks (N = 2)

a = plume rise factor (a = 0.67)

h = stack height (h = 25 ft)

Using this equation, PM emissions from the boiler shall not exceed 6.38 lb/MMBtu. However, pursuant to 326 IAC 6-2-3(d), PM emissions from any boiler that was in operation on or before June 8, 1972 shall not exceed 0.8 pounds per MMBtu heat input.

### **State and Applicability – Insignificant Facilities – Woodworking and Machining**

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2, the combined particulate emissions from insignificant woodworking and machining operations shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, based on a process weight rate of less than 100 pounds per hour.

### **State and Applicability – Insignificant Facilities – Cutting, Soldering, and Welding**

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2, the combined particulate emissions from any insignificant brazing equipment, cutting torches, soldering equipment, or welding equipment shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, based on a process weight rate of less than 100 pounds per hour.

### **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 appropriate corrective actions within a specific time period.

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

- (1) The surface coating booths identified as EU-A and EU-B and the two Repair Booths have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1, 2, 3, 4, 7, SV-28, and SV-33 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response step, in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations), and 326 IAC 2-7 (FESOP).

- (2) The woodworking shops identified as Shop 1, Shop 2 and Shop 3 have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the cyclones stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  - (f) In the event that cyclone failure has been observed, the failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions units. 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).

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

## **Conclusion**

The operation of this stationary recreational vehicle (trailer and camper) manufacturing plant shall be subject to the conditions of this FESOP 087-23735-00007.

**Appendix A: Emission Calculations**  
**VOC and PM emissions: Surface Coating Operations**

**Company Name:** Starcraft RV  
**Address:** 536 Michigan Street, Topeka, Indiana  
**FESOP:** 087-23735-00007  
**Reviewer:** Lek R. Traivaranon  
**Date:** January 29, 2007

Material ID Number	Material Density (lbs/gal)	Weight Percent Solids (%)	Weight Percent VOC (%)	VOC (lbs/gal)	Usage (gal/unit)	Maximum Throughput (units/hr)	PTE VOC (lbs/hr)	PTE VOC (tons/yr)	PTE PM/PM10 Before Controls (tons/yr)	Control Efficiency %	PTE PM/PM10 After Controls (tons/yr)
WB Tan	8.59	32.5%	19.0%	1.63	0.1450	4.5	1.74	7.61	7.98	80%	1.60
WB Black	8.40	32.5%	17.9%	1.50	0.0890	4.5	0.91	3.97	4.79	80%	0.96
WB White	9.05	28.2%	10.1%	0.91	0.0220	4.5	0.08	0.36	1.11	80%	0.22
DBE	9.10	0.0%	100%	9.10	0.0990	4.5	36.89	161.6	0.00	NA	0
RAABE	8.50	11.0%	89.0%	7.57	0.0013	4.5	0.33	1.47	0.02	80%	0.00
T30B	8.00	0.0%	100%	8.00	0.0060	4.5	1.73	7.57	0.00	NA	0
999 Silcn	8.66	95.0%	5.0%	0.43	0.2500	4.5	0.21	0.92	40.54	80%	8
924 Floor	8.00	97.0%	3.0%	0.24	0.4200	4.5	0.11	0.48	64.24	80%	13
Mor Ad 647	9.25	100%	0.0%	0.00	0.0026	4.5	0.00	0.00	0.47	80%	0
Tile R Bond	11.16	1.0%	98.9%	11.04	0.0016	4.5	0.88	3.84	0.00	80%	0
Wood Glue	9.16	50.7%	1.0%	0.09	0.3540	4.5	0.01	0.06	32.40	80%	6
CL Metric	9.16	63.0%	37.0%	3.39	0.0122	4.5	0.63	2.76	1.39	80%	0
CL MT 45030	9.16	98.0%	2.0%	0.18	0.0220	4.5	0.00	0.01	3.89	80%	1
Epoxy A	14.00	93.0%	7.0%	0.98	0.2250	4.5	0.97	4.26	57.74	80%	12
Epoxy B	14.00	91.0%	9.0%	1.26	0.2320	4.5	1.66	7.26	58.26	80%	12
676 Adhesive	5.70	30.8%	69.2%	3.94	0.1280	4.5	8.96	39.25	4.43	80%	1
1013 Adhesive	7.25	54.0%	46.0%	3.34	0.2540	4.5	12.71	55.7	19.60	80%	4
777 Adhesive	9.90	81.6%	18.4%	1.82	0.2400	4.5	3.58	15.70	38.21	80%	8
RL SL 8011	8.50	100%	0.0%	0.00	0.3100	4.5	0.00	0.00	51.94	80%	10
9625	8.90	95.0%	5.0%	0.45	0.4400	4.5	0.39	1.72	73.33	80%	15
Oatey Abs	7.08	25.0%	75.0%	5.31	0.0200	4.5	2.54	11.11	0.70	80%	0
Lac Thinner	6.80	0.0%	100%	6.80	0.0750	4.5	15.61	68.4	0.00	NA	0
Methylene Chl	11.15	100%	0.0%	0.00	0.0500	4.5	0.00	0.00	10.99	80%	2
Mineral Spirits	6.40	0.0%	100%	6.40	0.0140	4.5	2.58	11.30	0.00	NA	0
Hexane	5.51	0.0%	100%	5.51	0.0140	4.5	1.91	8.38	0.00	NA	0
<b>TOTALS</b>								<b>413.7</b>	<b>472.0</b>		<b>94.40</b>

**Methodology**

PTE VOC (tons/yr) = Density (lbs/gal) x Usage (gals/unit) x Max. Throughput (units/hr) x Weight % VOC x 8760 hrs/yr x 1 ton/2,000 lbs

PTE PM/PM10 Before Controls (tons/yr) = Density (lbs/gal) x Usage (gals/unit) x Max. Throughput (units/hr) x Weight % Solids x 8760 hrs/yr x 1 ton/2,000 lbs

PTE PM/PM10 After Controls (tons/yr) = PTE PM/PM10 Before Controls (tons/yr) x (1 - Control Efficiency)

PTE HAPs (tons/yr) = Annual HAPs (lbs/yr) x 8760/2138 ((hrs/yr)/(hrs of operation/yr)) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
HAP Emissions From Surface Coating Booths**

**Company Name:** Starcraft RV  
**Address:** 536 Michigan Street, Topeka, Indiana  
**FESOP:** 087-23735-00007  
**Reviewer:** Lek R. Traivaranon  
**Date:** January 29, 2007

Material ID Number	Density (lbs/gal)	Usage (gal/unit)	Maximum Throughput (units/hr)	Weight % Toluene	Weight % Vinyl Acetate	Weight % Ethyl-benzene	Weight % Xylene	Weight % Butyl Cellulosolve	Weight % Trochloro-ethane	Weight % Methylene Chloride	Weight % Methanol	Weight % Hexane	Weight % MIBK	PTE Toluene	PTE Vinyl Acetate	PTE Ethyl-benzene	PTE Xylene	PTE Butyl Cellulosolve	PTE Trochloro-ethane	PTE Methylene Chloride	PTE Methanol	PTE Hexane	PTE MIBK
WB Tan	8.59	0.145	4.5	0%	0%	0%	0%	10%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	2.45	0.00	0.00	0.00	0.00	0.00
WB Black	8.4	0.089	4.5	0%	0%	0%	0%	7%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	1.03	0.00	0.00	0.00	0.00	0.00
WB White	9.05	0.022	4.5	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00
DBE	9.1	0.099	4.5	0%	0%	0%	0%	0%	0%	0%	0.5%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00
RAABE	8.5	0.001	4.5	0%	0%	7%	40%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.02	0.09	0.00	0.00	0.00	0.00	0.00	0.00
T30B	8	0.006	4.5	0%	0%	0%	0%	18%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.17	0.00	0.00	0.00	0.00	0.00
999 Silc	8.66	0.250	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
924 Floor	8	0.420	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mor Ad 647	9.25	0.003	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tile R Bond	11.16	0.002	4.5	2%	0%	0%	0%	0%	96%	0%	0%	0%	0%	0.01	0.00	0.00	0.00	0.00	0.34	0.00	0.00	0.00	0.00
Wood Glue	9.16	0.354	4.5	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CL Metric	9.16	0.012	4.5	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CL MT 45030	9.16	0.022	4.5	0%	0%	0%	0%	0%	0%	1.0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00
Epoxy A	14	0.225	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Epoxy B	14	0.232	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
676 Adhesive	5.7	0.128	4.5	0%	0%	0%	0%	0%	0%	0%	40%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.75	0.00
1013 Adhesive	7.25	0.254	4.5	46%	0%	0%	0%	0%	0%	0%	0%	0%	0%	16.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
777 Adhesive	9.9	0.240	4.5	0%	0%	0%	0%	0%	0%	0%	1.8%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.84	0.00	0.00
RL SL 8011	8.5	0.310	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9825	8.9	0.440	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey Abs	7.08	0.020	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lac Thinner	6.8	0.075	4.5	60%	0%	0%	0%	0%	0%	0%	9.9%	0%	10.0%	6.03	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.00	1.01
Methylene Cl	11.15	0.050	4.5	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	11.0	0.00	0.00	0.00
Mineral Spirits	8.4	0.014	4.5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hexane	5.51	0.014	4.5	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.52	0.00
<b>Total</b>														<b>23.0</b>	<b>0.64</b>	<b>0.02</b>	<b>0.09</b>	<b>3.77</b>	<b>0.34</b>	<b>11.0</b>	<b>1.97</b>	<b>7.27</b>	<b>1.01</b>

49.0

**Methodology**

PTE HAP (tons/yr) = Density (lbs/gal) x Usage (gals/unit) x Max. Throughput (units/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations  
Particulate Emissions - Woodworking Operations**

**Company Name:** Starcraft RV  
**Address:** 536 Michigan Street, Topeka, Indiana  
**FESOP:** 087-23735-00007  
**Reviewer:** Lek R. Traivaranon  
**Date:** January 30, 2007

Emissions Unit	Process Weight Rate (lbs/hr)	Control Efficiency (%)	Emission Factor* (lbs/lb wood)	PTE for PM/PM10 Before Controls (tons/yr)	PTE for PM/PM10 Before Controls (lbs/hr)	PTE for PM/PM10 After Controls (tons/yr)	PTE for PM/PM10 After Controls (lbs/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Shop 1	3130	96.0%	0.0399	547.0	125	21.9	5.00	5.53
Shop 2	565	99.2%	0.0619	153.2	35.0	1.23	0.28	1.76
Shop 3	295	95.0%	0.0627	81.0	18.5	4.05	0.92	1.14
Shop 4	100	99.0%	0.0627	27.5	6.27	0.27	0.06	0.55
<b>PTE TOTAL</b>				<b>808.7</b>		<b>22.15</b>		

Emission Unit	Process Weight Rate (lbs/hr)	Air Flow Rate (acfm)	Grain Loading (grain/ascf)	Control Efficiency (%)	PTE for PM/PM10 Before Controls (tons/yr)	PTE for PM/PM10 Before Controls (lbs/hr)	PTE for PM/PM10 After Controls (tons/yr)	PTE for PM/PM10 After Controls (lbs/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Insig. Woodworking	300	4000	0.03	90.0%	45.1	10.3	4.51	1.03	1.15

**Note:**

Available PM emissions from woodworking operations = 249 tons/year  
Emissions from all other units = 209 tons/year  
Therefore, based on pro-rated emissions calculations, PM emissions are:  
Shop 1 = 136.75 tons/year  
Shop 2 = 38.25 tons/year  
Shop 3 = 20.25 tons/year  
Shop 4 = 6.9 tons/year

**Methodology**

PTE Before Controls (tons/yr) = Process Weight Rate (lbs/hr) x Emission Factor (lbs/lb wood) x 8760 (hrs/yr) x 1 ton/2,000 lbs  
PTE Before Controls (lbs/hr) = Process Weight Rate (lbs/hr) x Emission Factor (lbs/lb wood)  
PTE After Controls (tons/yr) = PTE Before Controls (tons/yr) x (1 - Control Efficiency %)  
PTE After Controls (lbs/hr) = PTE Before Controls (lbs/hr) x (1 - Control Efficiency %)  
PTE (Insig. Woodworking) After Controls (tons/yr) = Air Flow Rate (acfm) x Grain Loading (gr/dscf) x 60 min/hr x 1 lb/7,000 gr x 8760 (hrs/yr) x 1 ton/2,000 lbs  
PTE (Insig. Woodworking) Before Controls (tons/yr) = PTE After Controls (tons/yr) x 1/(1 - Control Efficiency %)  
326 IAC 6-3-2 Allowable Emissions = 4.1 x Process Weight Rate (tons/hr)<sup>0.67</sup>  
The baghouses must be in operation at all times that the woodworking machinery is in operation in order to ensure compliance with 326 IAC 6.5-4-16.

**Appendix A: Emission Calculations**

**Company Name:** Starcraft RV  
**Address:** 536 Michigan Street, Topeka, Indiana  
**FESOP:** 087-23735-00007  
**Reviewer:** Lek R. Traivaranon  
**Date:** January 22, 2007

Booth Identification	Material	Density (Lb/Gal)	Weight % Organics	Weight % Solids	Weight % HAPs	Max. Usage (gal/unit)	Max Throughput (units/hour)	PTE of VOC (tons/year)	PTE of HAP (tons/year)	PTE of PM/PM10 (tons/year)	Control Efficiency (%)	Controlled PTE of PM/PM10 (tons/year)
Repair Booths 3, and 4	Isopropyl Alcohol	6.5	100%	0.0%	0.0%	0.0290	2.0	1.65	0.00	0.00	80%	0.00
	DCA488 Clear	7.0	94.5%	5.5%	17.0%	0.0430	2.0	2.49	0.45	0.15	80%	0.03
	DDL Lacquer	7.00	95.8%	4.2%	30.0%	0.0290	2.0	1.70	0.53	0.07	80%	0.01
	Hand Glaze	8.3	30.0%	10.0%	10.0%	0.0070	2.0	0.15	0.05	0.05	80%	0.01
	Hardener	10.00	20.0%	80.0%	2.0%	0.0006	4.5	0.02	0.00	0.09	80%	0.02
	883 Retarder	7.50	100%	0.0%	40.0%	0.0014	4.5	0.21	0.08	0.00	80%	0.00
	Putty Coat	13.30	18.0%	82.0%	23.0%	0.0055	4.5	0.26	0.33	1.18	80%	0.24
	TigerHair	13.30	28.0%	72.0%	0.0%	0.0001	4.5	0.01	0.00	0.02	80%	0.00
<b>Totals (each booth)</b>								<b>6.50</b>	<b>1.45</b>	<b>1.56</b>		<b>0.31</b>
<b>Totals (all 2 booths)</b>								<b>13.0</b>	<b>2.90</b>	<b>3.12</b>		<b>0.62</b>

**Methodology**

PTE of VOC/HAP (tons/year) = Density (lbs/gal) x Weight % Organics/HAP x Max. Usage (gal/unit) x Max Throughput (units/hour) x 8760 hours/year x 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Density (lbs/gal) x Weight % Solids x Max. Usage (gal/unit) x Max Throughput (units/hour) x 8760 hours/year x 1 ton/2000 lbs

Controlled PTE of PM/PM10 (tons/year) = PTE of PM/PM10 (tons/year) x ( 1 - Control Efficiency %)

**Appendix A: Emission Calculations**  
**Combustion Emissions from Natural Gas-fired Heaters**

**Company Name:** Starcraft RV  
**Address:** 536 Michigan Street, Topeka, Indiana  
**FESOP:** 087-23735-00007  
**Reviewer:** Lek R. Traivaranon  
**Date:** January 22, 2007

Total Heat Input Capacity (MMBtu/hour) 13.1
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Potential Throughput (MMscf/year) 113
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Emission Factor (lbs/MMscf)	Pollutant						
	PM*	PM10*	SO <sub>2</sub>	NOx **	VOC	CO	HAPs
PTE (tons/year)	0.11	0.43	0.034	5.64	0.31	4.74	0.11

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

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMscf.

Emission factors are from AP-42, Chapter 1.4, 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 (7/98).

All emission factors are based on normal firing.

**Methodology**

Potential Throughput (MMscf/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMscf/1,020 MMBtu

PTE (tons/year) = Potential Throughput (MMscf/year) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs