



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: February 1, 2008
RE: Champion Enterprises - Dutch Housing Plant / 087-23808-00045
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Champion Enterprises - Dutch Housing Plant 1500 North Detroit Street LaGrange, Indiana 46760

(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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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.: F087-23808-00045 | |
| Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality | Issuance Date: February 1, 2008 Expiration Date: February 1, 2008 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary mobile home manufacturer.

| | |
|------------------------------|--|
| Source Address: | 1500 North Detroit Street, LaGrange, Indiana 46760 |
| Mailing Address: | P. O. Box 258, LaGrange, Indiana 46760 |
| General Source Phone Number: | (260) 463-2270 |
| SIC Code: | 2451 |
| County Location: | LaGrange |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules 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)]

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

(a) Plant D:

Plant D, constructed in 1994, producing up to two (2) mobile home floors per hour, consisting of:

- (1) Product assembly at thirteen (13) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
- (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (3) Plant D mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(b) Plant E:

Plant E, constructed in 1995, producing up to two (2) mobile home floors per hour, consisting of:

- (1) Product assembly at fourteen (14) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles,

- vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
- (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (3) Plant E mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(c) Plant F:

Plant F, constructed in 1996, producing up to two (2) mobile home floors per hour, consisting of:

- (1) Product assembly at sixteen (16) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
- (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (3) Plant F mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

Plant G:

Plant G, constructed in 1997, producing up to two (2) mobile home floors per hour, consisting of:

- (1) Product assembly at twenty-one (21) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
- (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (3) Plant G mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

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, including the following:

- (1) Plant D direct fired heaters, including two (2) heaters, identified as Heaters 1 and 2, individually rated at 0.2 million British thermal units per hour (MMBtu/hr), exhausting through stacks SVH1 and SVH2 respectively; two (2) heaters, identified as Heaters 3 and 4, individually rated at 0.4 MMBtu/hr, exhausting through stacks SVH3 and SVH4 respectively; and four (4) heaters, identified as Heaters 7 through 10, individually rated at 0.1 MMBtu/hr, all exhausting through stacks SVH7 through SVH10 respectively.
 - (2) Plant E direct fired heaters, including one (1) heater, identified as Heater 11 rated at 0.4 MMBtu/hr, exhausting through stack SVH11; two (2) heaters, identified as Heaters 12 and 13, individually rated at 0.8 MMBtu/hr, exhausting through stack SVH12 and SVH13 respectively; and one (1) heater, identified as Heaters 15, individually rated at 0.125 MMBtu/hr, exhausting through stack SVH15.
 - (3) Plant F direct fired heaters, including five (5) heaters, identified as Heaters 16 through 20, with individual heat input rates of 0.4 MMBtu/hr, exhausting through stacks SVH16 through SVH20 respectively; and two (2) heaters, identified as Heaters 21 and 22, individually rated at 0.125 MMBtu/hr, exhausting through stacks SVH21 and SVH22 respectively.
 - (4) Plant G direct fired heaters, including five (5) heaters, identified as Heaters 23 through 27, individually rated at 0.4 MMBtu/hr, all exhausting through stacks SVH23 through SVH27; and three (3) heaters, identified as Heaters 28 through 30, individually rated at 0.125 MMBtu/hr, exhausting through stack SVH28 through SVH30 respectively.
- (b) Equipment powered by internal combustion engines with capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including plant lift trucks.
 - (c) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including the total use of less than 100 pounds of welding consumables at Plants D, E, F, and G. [326 IAC 6-3-2]
 - (e) Closed loop heating and cooling systems.
 - (f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
 - (g) Heat exchanger cleaning and repair.
 - (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
 - (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

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

Trimming of wood and other construction materials using hand tools. [326 IAC 6-3-2]

- (l) Other activities and categories with negligible potential uncontrolled HAP emissions:

Four (4) application systems of methylenediphenyl diisocyanate (MDI) used in polymerization reactions when using polymerizing adhesives (i.e. F2100A ITW Foamseal). The total MDI emissions from this activity are calculated to be about 1.7×10^{-4} pounds per hour (1.532 pounds per year, based on 8,760 hours per year of operations).

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F087-23808-00045, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 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. All 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
MC 61-53 IGCN 1003
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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 F087-23808-00045 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
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using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

(2) review of operation and maintenance procedures and records; 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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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) Plant D:
Plant D, constructed in 1994, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at thirteen (13) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (b) Plant E:
Plant E, constructed in 1995, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at fourteen (14) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (c) Plant F:
Plant F, constructed in 1996, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at sixteen (16) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
- (d) Plant G:
Plant G, constructed in 1997, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at twenty-one (21) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total VOC input usage to each of Plants D, E, F and G, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, paints, ceiling texture, cleaners and VOC solvents, shall be limited to less than 25 tons for each plant per twelve (12) consecutive month period, excluding VOC usage for wood furniture/cabinet coating which is regulated in Condition D.1.3.

Compliance with this requirement shall make the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable to coating facilities at Plants D, E, F and G.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total combined VOC usage at Plants D, E, F and G, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.8 tons per twelve (12) consecutive month period with compliance to be determined by the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOCs to less than one-hundred (100) tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 not applicable to this source.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), surface coatings applied to wood furniture and cabinets at each of Plants D, E, F and G, shall utilize one of the following application methods:

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

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total combined usage of any single hazardous air pollutant (HAP) at Plants D, E, F and G shall be limited to less than ten (10) tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than ten (10) tons per twelve (12) consecutive month period with compliance to be determined by the end of each month.
- (b) The total combined usage of all hazardous air pollutants (HAPs) at Plants D, E, F and G shall be limited to less than 24.5 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance to be determined by the end of each month.

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 this facility.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-4-1(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 VOC Emissions and HAP Emissions

Compliance with Conditions D.1.1, D.1.2 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the relevant total volatile organic compound, and single HAP and combined HAP usages for the most recent twelve (12) month period.

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

There are no specific compliance monitoring requirements applicable to these facilities.

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

D.1.8 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1 through D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, except where noted, and shall be complete and sufficient to establish compliance with the VOC usage and emission limits established in Conditions D.1.1 through D.1.3, and the HAP usage limits established in Condition D.1.4.
- (1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) Method of application for wood furniture coating usage, including touch-up coatings, at each of Plants D, E, F and G;
 - (3) Monthly VOC usage at each of Plants D, E, F and G;
 - (4) Total individual HAP and total combination of HAPs usage at Plants D, E, F and G combined, for each month.
 - (5) Weight of VOC emitted from each of Plants D, E, F and G, for each compliance period; and
 - (6) Weight of individual and total HAPs emitted from Plants D, E, F and G combined, for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-2.2(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Mill Room

- (a) Plant D:
 Plant D mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (b) Plant E:
 Plant E mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (c) Plant F:
 Plant F mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (d) Plant G:
 Plant G mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) the allowable particulate emission rate from Plants D, E, F and G mill shops shall not exceed the allowable PM emission rate as follows, calculated using their maximum process weight rate.

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:

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

| Emission Unit/Activity | Process Weight Rate (tons/hr) | PM Emission Rate (lbs/hr) |
|------------------------|----------------------------------|------------------------------|
| Plant D Mill Shop | 5.13 | 12.27 |
| Plant E Mill Shop | 5.13 | 12.27 |
| Plant F Mill Shop | 5.13 | 12.27 |
| Plant G Mill Shop | 5.13 | 12.27 |

D.2.2 PM and PM₁₀ Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

PM and PM₁₀ emitted from the control device of each facility shall be limited as follows:

Plants D, E, F and G mill shop baghouses shall not exceed 0.592 pounds of PM/PM₁₀ emitted per ton of wood processed.

Compliance with this condition limits the potential to emit of PM and PM₁₀ from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to this source for emissions of PM₁₀. Compliance with this condition shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable to this source.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plants D, E, F and G mill shops and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM) and PM₁₀

In order to comply with D.2.1 and D.2.2, the baghouses for PM and PM₁₀ control to Plants D, E, F and G mill shops shall be in operation at all times that the mill shops woodworking equipment is in operation.

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

D.2.5 Visible Emission Notations

- (a) Daily visible emission notations of Plants D, E, F and G mill shops baghouse exhaust shall be performed once per day during normal daylight operations when venting 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, eight 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 characteristic of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling Plants D, E, F and G mill shop operations. For sources capable of redirecting vents, a baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emissions notations for Plants D, E, F and G mill shops exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the result of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including the total use of less than 100 pounds of welding consumables at Plants D, E, F, and G. [326 IAC 6-3-2]
- (k) Other activities and categories with PM/PM₁₀ emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including:
 - Trimming of wood and other construction materials using hand tools. [326 IAC 6-3-2]

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment, as insignificant activities:

- (1) The following equipment related to manufacturing activities resulting in the negligible emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including the total use of less than 100 pounds of welding consumables at Plants D, E, F and G.
- (2) Trimming of less than 100 pounds per hour of wood and other construction materials using hand tools.

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

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

Source Name: Champion Enterprises - Dutch Housing Plant
Source Address: 1500 North Detroit Street, LaGrange, Indiana 46760
Mailing Address: P. O. Box 258, LaGrange, Indiana 46760
FESOP Permit No.: F087-23808-00045

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Champion Enterprises - Dutch Housing Plant
Source Address: 1500 North Detroit Street, LaGrange, Indiana 46760
Mailing Address: P. O. Box 258, LaGrange, Indiana 46760
FESOP Permit No.: F087-23808-00045

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Usage Report

Source Name: Champion Enterprises - Dutch Housing Plant
 Source Address: 1500 North Detroit Street, LaGrange, Indiana 46760
 Mailing Address: P. O. Box 258, LaGrange, Indiana 46760
 FESOP Permit No.: F087-23808-00045
 Facility: Plants D, E, F and G
 Parameter: VOC input usage
 Limit: total VOC input usage to each of Plants D, E, F and G, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, paints, ceiling texture, cleaners and VOC solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period, including VOC usage for wood furniture/cabinet coating which is regulated at Condition D.1.3.

Year: _____

| Month | VOC Usage This Month (tons) | | | | VOC Usage Past 11 Months (tons) | | | | 12 Month Total VOC Usage (tons) | | | |
|---------|-----------------------------|---|---|---|---------------------------------|---|---|---|---------------------------------|---|---|---|
| | Plant: | | | | Plant: | | | | Plant: | | | |
| | D | E | F | G | D | E | F | G | D | E | F | G |
| 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: Champion Enterprises - Dutch Housing Plant
 Source Address: 1500 North Detroit Street, LaGrange, Indiana 46760
 Mailing Address: P. O. Box 258, LaGrange, Indiana 46760
 FESOP Permit No.: F087-23808-00045
 Facility: Plants D, E, F and G
 Parameter: VOC, single and combined HAPs input usage
 Limit: (a) total combined VOC input usage at Plants D, E, F and G, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.8 tons per twelve (12) consecutive month period.
 (b) total combined input usage of any single hazardous air pollutant (HAP) at Plants D, E, F and G shall be limited to less than 10 tons per twelve (12) consecutive month period.
 (c) total combined input usage of all hazardous air pollutants (HAPs) at Plant D, E, F and G shall be limited to less than 24.5 tons per twelve (12) consecutive month period.

YEAR: _____

| Month | Total Input Usage This Month (tons) | | | Total Input Usage Previous 11 Months (tons) | | | Total 12 Month Input Usage (tons) | | |
|---------|-------------------------------------|-------------|---------------|---|-------------|--------------|-----------------------------------|-------------|---------------|
| | VOC | Single* HAP | Combined HAPs | VOC | Single* HAP | Combined HAP | VOC | Single* HAP | Combined HAPs |
| 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: Champion Enterprises - Dutch Housing Plant
 Source Address: 1500 North Detroit Street, LaGrange, Indiana 46760
 Mailing Address: P. O. Box 258, LaGrange, Indiana 46760
 FESOP Permit No.: F087-23808-00045

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

| | |
|--|---|
| Source Name: | Champion Enterprises - Dutch Housing Plant |
| Source Location: | 1500 North Detroit Street, LaGrange, IN 46760 |
| County: | LaGrange |
| SIC Code: | 2451 |
| Operation Permit No.: | F087-11757-00045 |
| Operation Permit Issuance Date: | August 6, 2002 |
| Permit Renewal No.: | F087-23808-00045 |
| Permit Reviewer: | Marcia Earl |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Champion Enterprises - Dutch Housing Plant relating to the operation of a stationary mobile home manufacturer.

History

On October 24, 2006, Champion Enterprises - Dutch Housing Plant submitted applications to the OAQ requesting to renew its operating permit. Champion Enterprises - Dutch Housing Plant was issued a FESOP permit F087-11757-00045 on August 6, 2002.

Source Definition

This source owns two (2) plants that are located approximately 15 miles apart, and that are located at the following addresses:

- (a) Dutch Housing Plant (this source) is located at 1500 N. Detroit Street, LaGrange, Indiana 46761; and
- (b) Redman Homes Plant is located at 302 Redman Drive, Topeka, Indiana 46571.

These two (2) plants have the same SIC codes and are owned by one (1) company. However, the properties are not considered to be "adjacent" since there is not a nexus between the activities at the two plant locations (i.e., no contribution of parts used in final production nor resources sharing). Based on this, the Dutch and Redman Plants are considered as two (2) separate sources, and the Redman Plant will be permitted under FESOP 087-23807-00045 when issued.

Permitted Emission Units and Pollution Control Equipment

The source is comprised of four (4) individual production buildings, identified as Plant D, Plant E, Plant F and Plant G with the following permitted emission units and pollution control devices:

- (a) Plant D:
Plant D, constructed in 1994, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at thirteen (13) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
 - (3) Plant D mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector with no identification, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (b) Plant E:
Plant E, constructed in 1995, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at fourteen (14) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
 - (3) Plant E mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector with no identification, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (c) Plant F:
Plant F, constructed in 1996, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at sixteen (16) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.

- (3) Plant F mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector with no identification, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.
- (d) Plant G:
Plant G, constructed in 1997, producing up to two (2) mobile home floors per hour, consisting of:
- (1) Product assembly at twenty-one (21) workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives applied to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, with emissions exhausting into the building.
 - (2) Wallboard coating area for the spray application of gypsum-based ceiling texture to wallboard, with emissions exhausting into the building.
 - (3) Plant G mill room, processing 10,265 pounds per hour of wood, consisting of woodworking equipment including radial arm saws and table saw, with particulate matter controlled by a vacuum collection system with fabric filter dust collector with no identification, exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

In 2006, one (1) insignificant heater (Heater 30) was installed at Plant G, rated at 0.125 MMBtu/hr and exhausting to stack SVH30. Heater 30 was installed under the provisions of 326 IAC 2-8-15 (Operational Flexibility).

Emission Units and Pollution Control Equipment Removed from the Source

In 2005, two (2) insignificant heaters (Heaters 5 and 6), individually rated at 0.125 MMBtu/hr were removed from Plant D and one (1) insignificant heater (Heater 14), rated at 0.125 MMBtu/hr was removed from Plant E. No Conditions were affected by the removal of these heaters.

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, including the following:
 - (1) Plant D direct fired heaters, including two (2) heaters, identified as Heaters 1 and 2, individually rated at 0.2 million British thermal units per hour (MMBtu/hr), exhausting through stacks SVH1 and SVH2 respectively; two (2) heaters, identified as Heaters 3 and 4, individually rated at 0.4 MMBtu/hr, exhausting through stacks SVH3 and SVH4 respectively; and four (4) heaters, identified as Heaters 7 through 10, individually rated at 0.1 MMBtu/hr, all exhausting through stacks SVH7 through SVH10 respectively.
 - (2) Plant E direct fired heaters, including one (1) heater, identified as Heater 11 rated at 0.4 MMBtu/hr, exhausting through stack SVH11; two (2) heaters, identified

as Heaters 12 and 13, individually rated at 0.8 MMBtu/hr, exhausting through stacks SVH12 and SVH13 respectively; and one (1) heater, identified as Heater 15, rated at 0.125 MMBtu/hr, exhausting through stack SVH15.

- (3) Plant F direct fired heaters, including five (5) heaters, identified as Heaters 16 through 20, with individual heat input rates of 0.4 MMBtu/hr, exhausting through stacks SVH16 through SVH20 respectively; and two (2) heaters, identified as Heaters 21 and 22, individually rated at 0.125 MMBtu/hr, exhausting through stacks SVH21 and SVH22 respectively.
- (4) Plant G direct fired heaters, including five (5) heaters, identified as Heaters 23 through 27, individually rated at 0.4 MMBtu/hr, all exhausting through stacks SVH23 through SVH27 respectively; three (3) heaters, identified as Heaters 28 through 30, individually rated at 0.125 MMBtu/hr, exhausting through stacks SVH28 through SVH30 respectively.
- (b) Equipment powered by internal combustion engines with capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including plant lift trucks.
- (c) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including the total use of less than 100 pounds of welding consumables at Plants D, E, F, and G. [326 IAC 6-3-2]
- (e) Closed loop heating and cooling systems.
- (f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (g) Heat exchanger cleaning and repair.
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Other activities and categories with PM/PM₁₀ emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including:

Trimming of wood and other construction materials using hand tools. [326 IAC 6-3-2]
- (l) Other activities and categories with negligible potential uncontrolled HAP emissions:

Four (4) application systems of methylenediphenyl diisocyanate (MDI) used in polymerization reactions when using polymerizing adhesives (i.e. F2100A ITW Foamseal).

The total MDI emissions from this activity are calculated to be about 1.7×10^{-4} pounds per hour (1.532 pounds per year, based on 8,760 hours per year of operations).

Existing Approvals

The source has been operating under the previous FESOP 087-11757-00045 issued on August 6, 2002, with an expiration date of August 6, 2007, with no amendments or revisions.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (° F) |
|-------------------------------------|---------------|-----------------|------------------|-------------------|
| Plant D Heater 1 Stack SVH1 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 2 Stack SVH2 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 3 Stack SVH3 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 4 Stack SVH4 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 7 Stack SVH7 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 8 Stack SVH8 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 9 Stack SVH9 | 24 | 0.33 | N/A* | Ambient |
| Plant D Heater 10 Stack SVH10 | 24 | 0.33 | N/A* | Ambient |
| Plant E Heater 11 Stack SVH11 | 24 | 0.33 | N/A* | Ambient |
| Plant E Heater 12 Stack SVH12 | 24 | 0.33 | N/A* | Ambient |
| Plant E Heater 13 Stack SVH13 | 24 | 0.33 | N/A* | Ambient |
| Plant E Heater 15 Stack SVH15 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 16 Stack SVH16 | 24 | 0.33 | N/A* | Ambient |

Stack Summary (Continued)

| | | | | |
|-------------------------------------|----|------|------|---------|
| Plant F Heater 17 Stack SVH17 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 18 Stack SVH18 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 19 Stack SVH19 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 20 Stack SVH20 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 21 Stack SVH21 | 24 | 0.33 | N/A* | Ambient |
| Plant F Heater 22 Stack SVH22 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 23 Stack SVH23 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 24 Stack SVH24 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 25 Stack SVH25 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 26 Stack SVH26 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 27 Stack SVH27 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 28 Stack SVH28 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 29 Stack SVH29 | 24 | 0.33 | N/A* | Ambient |
| Plant G Heater 30 Stack SVH30 | 24 | 0.33 | N/A* | Ambient |

* Not Applicable

Emission Calculations

See Appendix A, pages 1 - 6 of this document for detailed emission calculations.

County Attainment Status

The source is located in LaGrange County.

| Pollutant | Status |
|-------------------|------------|
| PM _{2.5} | Attainment |
| PM ₁₀ | Attainment |
| SO ₂ | Attainment |
| NO _x | Attainment |
| 8 hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) LaGrange County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) LaGrange County has been classified as attainment or unclassifiable for PM/PM₁₀, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 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 compounds (VOC) emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Pollutant | Unrestricted Potential Emissions (tons/yr) |
|------------------|--|
| PM | 1066.24 |
| PM ₁₀ | 1066.54 |
| SO ₂ | 0.00 |
| VOC | 280.68 |
| CO | 2.90 |
| NO _x | 0.00 |

| HAPs | Unrestricted Potential Emissions (tons/yr) |
|-------------------|--|
| Benzene | 0.03 |
| Ethyl Benzene | 0.01 |
| Dichlorobenzene | Negligible |
| Formaldehyde | Negligible |
| Hexane | 4.37 |
| Toluene | 0.13 |
| Lead | Negligible |
| Cadmium | Negligible |
| Chromium | 0.03 |
| Manganese | 0.090 |
| Nickel | Negligible |
| Xylene | 13.33 |
| MDI | 0.01 |
| Colbalt | Negligible |
| Glycol Ethers | 1.28 |
| Total HAPs | 19.44 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than 100 tons per year. This source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM₁₀ and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of SO₂, CO and NO_x are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, this source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

This source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission unit. 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.

| Process/emission unit | Potential To Emit (tons/year) | | | | | | |
|-------------------------------------|-------------------------------|------------------|-----------------|-----------------|------|-----------------|---|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPS |
| Plant D, E, F and G Surface Coating | 0.00 | 0.00 | 0.00 | less than 98.80 | 0.00 | 0.00 | less than 10 tons per year of single HAP (Xylene) less than 24.5 tons per year total HAP |

| | | | | | | | |
|---|-------|-------|------|---------------|------|------|--|
| Plant D, E, F and G Mill Shop | 53.20 | 53.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Plant D, E, F and G total welding | 2.28 | 2.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Natural Gas Combustion Sources (27 Heaters) | 0.00 | 0.30 | 0.00 | 0.00 | 2.90 | 0.00 | 0.2463 |
| Total | 55.48 | 55.78 | 0.00 | Less than 100 | 2.90 | 0.00 | less than 10 tons per year single HAP (Xylene) less than 25 tons per year of total HAPs |

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than one hundred (< 100) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) 40 CFR Part 60, Subpart K, Ka, and Kb (Standards of Performance for Petroleum Liquid Storage Vessels and Volatile Liquid Storage Vessels which is incorporated by reference 326 IAC 12.

The insignificant activity identified as 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 is not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR Parts 60.110, 60.110a through 60.115a or 60.110b through 60.117, as Subparts K, Ka, and Kb, respectively) since the storage capacity is below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)). Therefore, this rule is not applicable to this source.

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

- (b) The requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), which is incorporated by reference 326 IAC 20 does not apply to this source, since the source is not a major source of HAPs and will limit the coating material usage such that single HAP emissions are less than 10 tons per year and combined HAP emissions are less than 25 tons per year.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 40 CFR Part 61, 326 IAC 20 and 40 CFR Part 63) included in this permit.

- (c) This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR Part 64 (Compliance Assurance Monitoring), are not included in this permit.

State Rule Applicability – Entire Source

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

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

326 IAC 2-6 (Emission Reporting)

This source is located in LaGrange County and it is not required to operate under a Part 70 permit because the Permittee has limited their emissions below Title V levels. Therefore, 326 IAC 2-6 is not included in this permit.

326 IAC 2-8 (FESOP)

Pursuant 326 IAC 2-8 (FESOP), the amount of PM₁₀ and VOC shall be limited to less than one hundred (100) tons per year, and single and combined HAPs shall be limited to less than 10 and 25 tons per year, respectively as follows:

- (a) The source shall limit total VOC input usage at Plants D, E, F, and G to less than 98.80 tons per twelve (12) consecutive month period. The VOC usage limit is required to limit the potential to emit (PTE) of VOC from the entire source to less than one-hundred (100) tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month.
- (b) The total input usage of any single hazardous air pollutant (HAP) at Plants D, E, F and G shall be limited to less than ten (10) tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than ten (10) tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month.
- (c) The total combined input usage of all hazardous air pollutants (HAPs) at Plants D, E, F and G shall be limited to less than 24.5 tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month.
- (d) The total uncontrolled PM₁₀ emitted from the source is less than 56 tons per year, including the potential to emit of significant activities. The source-wide potential to emit total PM₁₀ is less than 100 tons per year.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitation)

This source is located in LaGrange County and has Particulate Matter (PM) emissions over 25 tons per year. LaGrange County is not a primary or secondary non-attainment area. Therefore, 326 IAC 6-5 is not applicable to this source.

326 IAC 6.5 (Particular Matter Limitations Except Lake County)

This source is located in LaGrange County and is not one of the specifically listed counties and does not have the potential to emit (PTE) over 100 tons or more of particulate matter (PM). Therefore, 326 IAC 6.5 is not applicable to this source.

State Rule Applicability – Surface Coating

326 IAC 2-4.1-1 (New Source Toxics Control)

The surface coating operation will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, this source has agreed to limit their surface coating operation to less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 is not applicable to this source.

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

The process of applying ceiling texture to wallboard is assumed to generate no particulate overspray emissions. The material is a paste-like substance (e.g. wet plaster or spackle) that adheres to the wallboard or deposits near the applicator with no particulate emissions.

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

Pursuant to 326 IAC 8-1-6, this rule applies to facilities located anywhere in the state that was constructed on or after January 1, 1980, which have the potential to emit volatile organic compounds (VOC) of twenty (25) tons per year or more. The potential to emit (PTE) of VOC from the product assembly at each of the four (4) plants is estimated at seventy (70) tons per year (i.e. total VOC from Plants D through G is 281 tons per year, divided between the four (4) plants, each plant has a VOC PTE of 70 tons per year, assuming equal production at the four plants). This source has opted to limit VOC input usage as follows: the VOC input to each of Plants D, E, F and G, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, paints, ceiling texture, cleaners and VOC solvents, shall be limited to less than 25 tons per plant (Plant D, E, F and G), excluding VOC usage for wood furniture/cabinet coating which is regulated under 326 IAC 8-2-12. Compliance with this condition shall render the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable to the coating facilities at Plants D, E, F and G.

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

Pursuant to 326 IAC 8-2-12, facilities existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions greater than 15 pounds of VOC per day before add-on controls, shall comply with the applicable requirements of 326 IAC 8-2-12. This source uses pre-fabricated, pre-finished, wood cabinets in the construction of mobile homes. The source does, however, use touch-up coatings for product finished at each of Plants D, E, F and G, but in amounts below 15 pounds of VOC per day and well below the exempted ten (10) gallons of coating per day, as cited at 326 IAC 8-2-12(b). Therefore, the requirements of this rule do not apply to either of the four (4) facilities. However, since the source uses a compliant wood coating application method (i.e. wipe) for product finishing, the rule requirements are extended to each of the final finish facilities as follows:

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), surface coatings applied to wood furniture and cabinets at each of Plants D, E, F and G, shall utilize one of the following applications methods:

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

This source uses a wipe application method for all touch-up coating operations. The source will therefore comply with this rule and records of the application system utilized shall be maintained to verify this status.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in LaGrange County and was constructed after January 1, 1980. Therefore, this rule is not applicable to this source.

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

Pursuant to 326 IAC 8-7, stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties, and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in LaGrange County. Therefore, this rule is not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)

This rule is applicable to sources in Lake, Porter, Clark or Floyd Counties who perform wood furniture manufacturing. This source is located in LaGrange County and uses pre-fabricated, pre-finished, wood cabinets in the construction of mobile homes. Therefore, this rule is not applicable to this source.

State Rule Applicability – Woodworking Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) the allowable particulate emission rate from Plants D, E, F and G mill shop shall not exceed the allowable PM emissions, calculated using their maximum process weight rate.

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:

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

Plants D, E, F, and G mill shops are equipped with fabric filter dust collectors for particulate control. The controlled particulate emission rate is 3.04 pounds per hour, which is less than the allowable particulate emission rate of 12.27 pounds per hour. Therefore, the Permittee is able to comply with 326 IAC 6-3-2.

State Rule Applicability – Insignificant Activities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

This source is not subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because the twenty-seven (27) direct fired heaters from Plants D, E, F, and G are not indirect fired heaters pursuant to 326 IAC 6-2-4.

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard (NSPS) and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment, as insignificant activities:

- (1) The following equipment related to manufacturing activities resulting in the negligible emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including the total use of less than 100 pounds of welding consumables at Plants D, E, F and G.
- (2) Trimming of less than 100 pounds per hour of wood and other construction materials using hand tools.

Testing Requirements

Compliance testing is not required of this source. The coating material usage and related VOC and HAP emissions are based on an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and each of the particulate emitting activities (mill shops) is controlled by a baghouse with emissions below the relevant allowable particulate matter emission rates, and the source shall comply with the relevant control technology operating, monitoring and record keeping requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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) Plants D, E, F and G mill shops have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of Plants D, E, F and G mill shops baghouse exhaust shall be performed once per day during normal daylight operations when

venting 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 characteristic of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (f) An inspection shall be performed each calendar quarter of all bags controlling the mill shops. For sources capable of redirecting vents, a baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (g) Broken or Failed Bag Detection
 - (1) 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)
 - (2) 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 emission 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 pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouses for Plants D, E, F and G mill shops must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

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 24, 2006.

Conclusion

The operation of this stationary mobile home manufacturing plant shall be subject to the conditions of the **FESOP 087-23808-00045**.

Appendix A: Emission Summary

Company Name: Champion Enterprises - Dutch Housing Plant
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit NO: F087-23808-00045
Reviewer: Marcia Earl
Date: July 2007

Uncontrolled Emissions

| Emission Units | PM | PM₁₀ | SO₂ | VOC | CO | NOx | HAPs |
|---|-----------|------------------------|-----------------------|------------|-----------|------------|-------------|
| Plants D, E, F and G Coating Operations | 0.00 | 0.00 | 0.00 | 280.68 | 0.00 | 0.00 | 19.19 |
| Plants D, E, F and G Mill Shops | 1063.96 | 1063.96 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Plants D, E, F and G total welding | 2.28 | 2.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Natural Gas Combustion Sources (27 Heaters) | 0.00 | 0.30 | 0.00 | 0.00 | 2.90 | 0.00 | 0.2463 |
| Total | 1066.24 | 1066.54 | 0.00 | 280.68 | 2.90 | 0.00 | *19.44 |

Controlled Emissions

| Emission Units | PM | PM₁₀ | SO₂ | VOC | CO | NOx | HAPs |
|---|-----------|------------------------|-----------------------|--------------------|-----------|------------|---|
| Plants D, E, F and G Coating Operations | 0.00 | 0.00 | 0.00 | less than 99.80 | 0.00 | 0.00 | Less than 10 tons single HAP |
| Plants D, E, F and G Mill Shops | 53.20 | 53.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Plants D, E, F and G total welding | 2.28 | 2.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Natural Gas Combustion Sources (27 Heaters) | 0.00 | 0.30 | 0.00 | 0.00 | 2.90 | 0.00 | 0.00 |
| Total | 55.48 | 55.78 | 0.00 | less than 100 | 2.90 | 0.00 | Less than 10 tons single HAP Less than 25 tons total HAP |

* Xylene from the coating operation has the potential to emit over 10 tons per year for a single HAP.

**Appendix A: Emission Summary
Natural Gas Combustion Only
MM BTU/HR <100
Heater Totals**

Company Name: Champion Enterprises - Dutch Housing Plant
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No: F087-23808-00045
Reviewer: Marcia Earl
Date: July 2007

| | | |
|---------|-----------------------|-------------------|
| Plant D | Heaters 1 and 2 | 0.2 MMBtu each |
| Plant D | Heaters 3 and 4 | 0.4 MMBtu each |
| Plant D | Heaters 7 through 10 | 0.1 MMBtu each |
| Plant E | Heater 11 | 0.4 MMBtu |
| Plant E | Heaters 12 and 13 | 0.4 MMBtu each |
| Plant E | Heater 15 | 0.125 MMBtu |
| Plant F | Heaters 16 through 20 | 0.4 MMBtu each |
| Plant F | Heaters 21 and 22 | 0.125 MMBtu each |
| Plant G | Heaters 23 through 27 | 0.4 MMBtu each |
| Plant G | Heaters 28 through 30 | 0.125 MMBtu each |
| | Total | 8.35 MMBtu |

Uncontrolled

| Emission Units | PM * | PM₁₀ * | SO₂ | VOC | CO ** | NO_x | HAPs |
|---|-------------|--------------------------|-----------------------|-------------|--------------|-----------------------|---------------|
| (Plant D) Heaters 1 through 4 | 0.00 | 0.00 | 0.00 | 0.00 | 0.40 | 0.00 | 0.0098 |
| (Plant D) Heaters 7 through 10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 | 0.00 | 0.0033 |
| (Plant E) Heaters 11 through 13 and Heater 15 | 0.00 | 0.10 | 0.00 | 0.00 | 0.80 | 0.00 | 0.0186 |
| (Plant F) Heaters 16 through 22 | 0.00 | 0.10 | 0.00 | 0.00 | 0.80 | 0.00 | 0.0186 |
| (Plant G) Heaters 23 through 30 | 0.00 | 0.10 | 0.00 | 0.00 | 0.80 | 0.00 | 0.1960 |
| Total | 0.00 | 0.30 | 0.00 | 0.00 | 2.90 | 0.00 | 0.2463 |

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

** Emission Factors for CO: Uncontrolled = 40 for heat input capacity <= 3 MMBtu/hr, = 84 for heat input capacity > 3 MMBtu/hr.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4. Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-03-006, 1-03-006-02, and 1-03-006-03 (SUPPL. D 7/98)

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Total HAPs Emission Plants D through G Heaters 1 through 29
Company Name: Champion Enterprises - Dutch Housing Plant
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit Number: F087-23808-00045
Reviewer: Marcia Earl
Date: August 2007

| | HAPs - Organics | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential Emission in tons/yr | 7.912E-05 | 3.574E-05 | 2.751E-03 | 6.780E-02 | 1.281E-04 |

| | HAPs - Metals | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential Emission in tons/yr | 1.883E-05 | 4.144E-05 | 5.273E-05 | 1.431E-05 | 7.912E-05 |

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

VOC and Particulate

From Surface Coating Operations at Plant D, E, F, and G

Company Name: Champion Enterprises - Dutch Housing Plant
Address City IN Zip: 1500 North Detroit Street, LaGrange, IN 46761
Permit Number: F087-23808-00045
Reviewer: Marcia Earl
Date: July 2007

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids)* | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids* | Transfer Efficiency |
|---|------------------|------------------------------------|----------------|-------------------|----------------|----------------------------------|------------------------|---------------------|---|----------------------------------|---------------------------------|------------------------------|------------------------------------|-----------------------------------|-------------------------------------|------------------------------|
| Miscellaneous Materials Coating Operations Collectively Applied at Plants D, E, F, & G | | | | | | | | | | | | | | | | |
| F2100A ITW Foamseal | 10.25 | 0.00% | 0.0% | 0.00% | 0.0% | n/a | 34.11058 | gal/hour | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | n/a | 100% |
| Shingle Tite Tubes | 8.33 | 30.01% | 0.0% | 30.01% | 0.0% | n/a | 2.43317 | gal/hour | 2.50 | 2.50 | 6.08 | 145.99 | 26.64 | 0.00 | n/a | 100% |
| Plastic Roof Cement | 8.33 | 30.01% | 0.0% | 30.01% | 0.0% | n/a | 7.41538 | gal/hour | 2.50 | 2.50 | 18.54 | 444.92 | 81.20 | 0.00 | n/a | 100% |
| IPS Weld On | 7.22 | 45.98% | 0.0% | 45.98% | 0.0% | n/a | 0.02452 | gal/hour | 3.32 | 3.32 | 0.08 | 1.95 | 0.36 | 0.00 | n/a | 100% |
| Bostik Super-Tak H.P. | 5.60 | 64.46% | 0.0% | 64.46% | 0.0% | n/a | 0.44567 | gal/hour | 3.61 | 3.61 | 1.61 | 38.61 | 7.05 | 0.00 | n/a | 100% |
| Sun Adhesive C-557 | 9.00 | 36.89% | 0.0% | 36.89% | 0.0% | n/a | 6.72019 | gal/hour | 3.32 | 3.32 | 22.31 | 535.46 | 97.72 | 0.00 | n/a | 100% |
| Harvey Seal | 11.33 | 33.01% | 0.0% | 33.01% | 0.0% | n/a | 0.12356 | gal/hour | 3.74 | 3.74 | 0.46 | 11.09 | 2.02 | 0.00 | n/a | 100% |
| Oatey Cleaner | 6.61 | 100.00% | 0.0% | 100.00% | 0.0% | n/a | 0.02452 | gal/hour | 6.61 | 6.61 | 0.16 | 3.89 | 0.71 | 0.00 | n/a | 100% |
| Seam Sealer SU 92 | 7.60 | 76.05% | 0.0% | 76.05% | 0.0% | n/a | 0.00962 | gal/hour | 5.78 | 5.78 | 0.06 | 1.33 | 0.24 | 0.00 | n/a | 100% |
| Stove and Fireplace Motar | 14.99 | 0.00% | 0.0% | 0.00% | 0.0% | n/a | 0.09279 | gal/hour | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | n/a | 100% |
| Bostik Chem Calk 900 | 10.16 | 6.20% | 0.0% | 6.20% | 0.0% | n/a | 0.02740 | gal/hour | 0.63 | 0.63 | 0.02 | 0.41 | 0.08 | 0.00 | n/a | 100% |
| Oatey ABS Cement | 7.07 | 77.93% | 0.0% | 77.93% | 0.0% | n/a | 0.14808 | gal/hour | 5.51 | 5.51 | 0.82 | 19.58 | 3.57 | 0.00 | n/a | 100% |
| Ohio Acoustical Sealant | 13.23 | 1.36% | 0.0% | 1.36% | 0.0% | n/a | 2.68798 | gal/hour | 0.18 | 0.18 | 0.48 | 11.61 | 2.12 | 0.00 | n/a | 100% |
| Spred Ultra Flat Latex Paint | 12.10 | 5.62% | 0.0% | 5.62% | 0.0% | n/a | 9.51635 | gal/hour | 0.68 | 0.68 | 6.47 | 155.31 | 28.34 | 0.00 | n/a | 100% |
| W.W. Mobilatex Adhesive | 9.57 | 52.98% | 0.0% | 52.98% | 0.0% | n/a | 0.02452 | gal/hour | 5.07 | 5.07 | 0.12 | 2.98 | 0.54 | 0.00 | n/a | 100% |
| Speed Demon Acrylic Caulk | 14.58 | 20.03% | 0.0% | 20.03% | 0.0% | n/a | 2.22452 | gal/hour | 2.92 | 2.92 | 6.50 | 155.89 | 28.45 | 0.00 | n/a | 100% |
| Touch-Up Coating of Wood Cabinets Collectively Applied at Plants D, E, F, and G | | | | | | | | | | | | | | | | |
| Deft 48w5 Wood Stain | 8.56 | 4.56% | | 4.56% | 0.0% | n/a | 0.00240 | gal/hour | 0.39 | 0.39 | 0.00 | 0.02 | 0.00 | 0.00 | n/a | 100% |
| Moores Int Wood Stain | 7.60 | 66.45% | | 66.45% | 0.0% | n/a | 0.07404 | gal/hour | 5.05 | 5.05 | 0.37 | 8.97 | 1.64 | 0.00 | n/a | 100% |
| Total Uncontrolled Potential To Emit: | | | | | | | | | | | 64.09 | 1538.01 | 280.68 | 0.00 | | |
| | | | | | | | | | | | 12-mos Input Usage Limit | Control Efficiency | Controlled VOC lbs per Hour | Controlled VOC lbs per Day | Controlled VOC tons per year | Controlled PM tons/yr |
| Total Controlled/Limited Potential to Emit: | | | | | | | | | | | 35.55% | 0.00% | 64.09 | 1538.01 | < 99.80 | 0.00 |

* Not Applicable. The process of applying ceiling texture to wallboard is assumed to generate no particulate overspray emissions. The material is a paste-like substance (e.g. wet plaster or spackle) that adheres to the wallboard or deposits near the applicator with no particulate emissions.

METHODOLOGY

The adhesive products F2100A ITW Foamseal and Pemco Adhesive are polymerizing adhesives that contain methylene bis(phenyl isocyanate) (MDI) and polymeric MDI (PMDI). PMDI completely polymerizes into the product and is not emitted.

Only trace amounts of MDI flash-off during product reaction. For Foamseal F2100, the material is 50% MDI and 50% PMDI. Computations of the MDI flash-off emissions were provided by the source and determined using "MDI Emissions Reporting Guidelines", published by The Society of the Plastics Industry, as 5e-07 lb MDI per lb-F2100A Foamseal used. Based on a maximum material usage rate of 34.11 gal/hr, this produces a VOC and MDI emission rate of 7.7e-04 tons per year.

Total VOC input usage at Plants D, E, F, and G, including VOC solvents, shall be limited such that the potential to emit (PTE) VOC from the source shall be limited to less than 100 tons per twelve (12) consecutive months; and the PTE

The VOC Input usage to each of Plants D, E, F, and G, respectively constructed in 1994, 1995, 1996, and 1997, including VOC solvent usage, shall be limited to less than 25 tons per twelve (12) consecutive months per plant. Compliance with this limit shall make the requirements of 326 IAC 8-1-6, BACT, not applicable to each plant.

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total Uncontrolled Potential Emission = Sum of All Coatings and Solvents Applied

Controlled VOC Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation)

Controlled PM Emission Rate = Uncontrolled Emission Rate * (1 - Control Efficiency)

Appendix A: Emission Calculations

HAP Emission Calculations

Surface Coating Operations at Plants D, E, F, and G

Company Name: Champion Enterprises - Dutch Housing
Address City IN Zip: 1500 North Detroit Street, LaGrange, IN 46761
Permit Number: F087-23808-00045
Permit Reviewer: Marcia Earl
Date: July 2007

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Benzene | Weight % Ethyl Benzene | Weight % Hexane | Weight % Toluene | Weight % Xylene | HAP EMISSION RATES (TONS PER YEAR) | | | | | Total ALL HAPs |
|--|------------------|--------------------------------|---------------------|------------------|------------------------|-----------------|------------------|-----------------|------------------------------------|---------------|-----------|-----------|-----------|----------------|
| | | | | | | | | | Benzene | Ethyl Benzene | Hexane | Toluene | Xylene | |
| F2100A ITW Foamseal | 10.25 | 34.110580 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Shingle Tite Tubes | 8.33 | 2.433170 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Plastic Roof Cement | 8.33 | 7.415380 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| IPS Weld ON | 7.22 | 0.024520 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Bostik Super-Tak H.P. | 5.60 | 0.445670 | gal/hour | 0.00% | 0.00% | 40.00% | 0.00% | 0.00% | 0.00 | 0.00 | 4.37 | 0.00 | 0.00 | 4.37 |
| Sun Adhesive C-557 | 9.00 | 6.720190 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00 | 0.00 | 0.00 | 0.00 | 13.25 | 13.25 |
| Harvey Seal | 11.33 | 0.123560 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Oatley Cleaner | 6.61 | 0.024520 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Seam Sealer SU 92 | 7.60 | 0.009620 | gal/hour | 0.00% | 0.00% | 0.00% | 32.50% | 0.00% | 0.00 | 0.00 | 0.00 | 0.10 | 0.00 | 0.10 |
| Stove and Fireplace Mortar | 14.99 | 0.092790 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Bostik Chem Calk 900 | 10.16 | 0.027400 | gal/hour | 0.00% | 0.90% | 0.00% | 0.00% | 4.10% | 0.00 | 0.01 | 0.00 | 0.00 | 0.05 | 0.06 |
| Oatley ABS Cement | 7.07 | 0.148080 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Spred Ultra Flat Latex Paint | 12.10 | 9.51635 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W.W. Mobilatex Adhesive | 9.57 | 0.02452 | gal/hour | 0.00% | 0.00% | 0.00% | 3.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 |
| Speed Demon Acrylic Caulk | 14.58 | 2.22452 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Deft 48w5 Wood Stain | 8.56 | 0.00240 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Moores Int. Wood Stain | 7.60 | 0.07404 | gal/hour | 1.20% | 0.00% | 0.00% | 0.00% | 1.20% | 0.03 | 0.00 | 0.00 | 0.00 | 0.03 | 0.06 |
| Total Uncontrolled Potential to Emit (tons per year) | | | | | | | | | 0.03 | 0.01 | 4.37 | 0.13 | 13.33 | (see below) |
| Total Controlled/Limited Potential to Emit (tons per year) | | | | | | | | | < than 10 | < than 10 | < than 10 | < than 10 | < than 10 | |

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Glycol Ethers | Weight % MDI * | Weight % Chromium Compounds | Weight % Cobalt Compounds | HAP EMISSION RATES (TONS PER YEAR) | | | | Total ALL HAPs |
|--|------------------|--------------------------------|---------------------|------------------------|----------------|-----------------------------|---------------------------|------------------------------------|----------|--------------------|------------------|----------------|
| | | | | | | | | Glycol Ethers | MDI | Chromium Compounds | Cobalt Compounds | |
| F2100A ITW Foamseal | 10.25 | 34.110580 | gal/hour | 0.00% | 5.00E-07 | 0.00% | 0.00% | 0.00 | 7.66E-04 | 0.00 | 0.00 | 0.00 |
| Shingle Tite Tubes | 8.33 | 2.433170 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Plastic Roof Cement | 8.33 | 7.415380 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| IPS Weld ON | 7.22 | 0.024520 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Bostik Super-Tak H.P. | 5.60 | 0.445670 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Sun Adhesive C-557 | 9.00 | 6.720190 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Harvey Seal | 11.33 | 0.123560 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Oatley Cleaner | 6.61 | 0.024520 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Seam Sealer SU 92 | 7.60 | 0.009620 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Stove and Fireplace Mortar | 14.99 | 0.092790 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Bostik Chem Calk 900 | 10.16 | 0.027400 | gal/hour | 0.00% | 1.10% | 0.00% | 0.00% | 0.00 | 0.01 | 0.00 | 0.00 | 0.01 |
| Oatley ABS Cement | 7.07 | 0.148080 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Spred Ultra Flat Latex Paint | 12.10 | 9.51635 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W.W. Mobilatex Adhesive | 9.57 | 0.02452 | gal/hour | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Speed Demon Acrylic Caulk | 14.58 | 2.22452 | gal/hour | 0.90% | 0.00% | 0.00% | 0.00% | 1.28 | 0.00 | 0.00 | 0.00 | 1.28 |
| Deft 48w5 Wood Stain | 8.56 | 0.00240 | gal/hour | 5.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Moores Int. Wood Stain | 7.60 | 0.07404 | gal/hour | 0.00% | 0.00% | 1.40% | 20.00% | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 |
| Total Uncontrolled Potential to Emit (tons per year) | | | | | | | | 1.28 | 0.01 | 0.03 | | 19.19 |
| Total Controlled/Limited Potential to Emit (tons per year) | | | | | | | | <10 | <10 | <10 | <10 | <25 |

METHODOLOGY

* Methylene Bis(phenyl isocyanate) (MDI) flash-off emissions for the Foamseal F2100 adhesive material provided by source based on "MDI Emissions Reporting Guidelines", published by The Society of the Plastic Industry. MDI emission factor is 5e-07 lb/lb-F2100A Foamseal used for this product, which is based on a 50% MDI content.

Total coating material input usage at Plants D, E, F, and G, including VOC solvents, shall be limited such that the potential to emit (PTE) single and combined HAP shall be limited to less than 10 tons and 25 tons per twelve (12) consecutive month period, respectively. Compliance with these limits shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % *8760 hrs/yr * 1 ton/2000 lbs. Limited Potential HAP Emission Rate (tons/yr) - Uncontrolled Potential HAP Emission Rate * COATING Material Input Limite (such that single HAP emissions < 10 tpy and total HAP emission <25 tpy)

Appendix A: Emissions Calculations

Welding

Plant D, E, F, and G

Company Name: Champion Enterprises - Dutch Housing Plant
Address City IN Zip: 1500 North Detroit Street, LaGrange, IN 46761
Permit Number: F087-23808-00045
Reviewer: Marcia Earl
Date: July 2007

| PROCESS | Total Max Electrode Consumption (lbs/hr) | EMISSION FACTORS * (lb pollutant / lb electrode) | | | | | EMISSIONS (lb/hr) | | | | | HAPS (lbs/hr) |
|--|--|--|-----------|----------|----------|----------|-----------------------|-----------|----------|----------|----------|------------------|
| | | PM = PM ₁₀ | Manganese | Nickel | Cobalt | Chromium | PM = PM ₁₀ | Manganese | Nickel | Cobalt | Chromium | |
| WELDING | | | | | | | | | | | | |
| Metal Inert Gas (E70S) - Plants D, E, F, and G | < than 100 | 5.20E-03 | 2.00E-04 | 1.00E-06 | 1.00E-06 | 1.00E-06 | 5.20E-01 | 2.00E-02 | 1.00E-04 | 1.00E-04 | 1.00E-04 | 0.020 |
| Uncontrolled Potential to Emit (lbs/hr) | | | | | | | 0.52 | 0.020 | 0.00 | 0.00 | 0.00 | 0.020 |
| Uncontrolled Potential to Emit (lbs/day) | | | | | | | 12.48 | 0.480 | 0.00 | 0.00 | 0.00 | 0.490 |
| Uncontrolled Potential to Emit (tons/year) | | | | | | | 2.28 | 0.090 | 0.00 | 0.00 | 0.00 | 0.090 |

METHODOLGY

Emission Factors from AP 42 (January 1995), Chapter 12.19, Tables 12.19-2, with MIG default electrode type E70S.
 Welding emissions, lb/hr: (max. lbs of electrode used/hr)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lb/day = emissions, lbs/hr X 24 hrs.day
 Emission, tons/yr = emissions, lb/hr X 8,760 X 1 ton/2,000 lbs.

Appendix A: PM Emission Calculations for Woodworking
Plant D, E, F, and G
Company Name: Champion Enterprise - Dutch Housing Plant
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit NO: F087-23808-00045
Reviewer: Marcia Earl
Date: July 2007

| Emission Units Description | Inlet Grain Loading (gr/acf) | Air to Cloth Ratio Air Flow (acfm/ft ²) | Total Filter Area (ft ²) | Control Device Fan Flow Rate (acfm) | PM Control Efficiency * (%) | Potential PMPM ₁₀ Emission Rate | | | | Process Weight Rate (lb/hr) | 326 IAC 6-3-2 PM Emission Rate (lb/hr) |
|--------------------------------------|------------------------------------|---|--|---|-----------------------------------|--|-----------|----------------|-----------|-----------------------------------|--|
| | | | | | | Before Controls | | After Controls | | | |
| | | | | | | (lb/hr) | (tons/yr) | (lb/hr) | (tons/yr) | | |
| Vacuum System & Baghouse PM Control: | | | | | | | | | | | |
| Plant D Sawmill | 2.60 | 0.275 | 9,920 | 2,725 | 95.0% | 60.73 | 265.99 | 3.04 | 13.30 | 10,265 | 12.27 |
| Plant E Sawmill | 2.60 | 0.275 | 9,920 | 2,725 | 95.0% | 60.73 | 265.99 | 3.04 | 13.30 | 10,265 | 12.27 |
| Plant F Sawmill | 2.60 | 0.275 | 9,920 | 2,725 | 95.0% | 60.73 | 265.99 | 3.04 | 13.30 | 10,265 | 12.27 |
| Plant G Sawmill | 2.60 | 0.275 | 9,920 | 2,725 | 95.0% | 60.73 | 265.99 | 3.04 | 13.30 | 10,265 | 12.27 |
| Total PM/PM₁₀ | | | | | | 242.92 | 1,063.96 | 12.16 | 53.20 | | |

Methodology:

* Actual control efficiency is listed as 99.95% in the permit application, but a lower efficiency is used herein to provide greater operating flexibility which does not affect compliance with the allowable emission limits for these operations.

Potential Uncontrolled Emissions (tons/yr) = Inlet Loading (grain/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 tons/2,000 lbs.

Potential Controlled Emissions (ton/yr) = Inlet Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1 - Control efficiency)

Total PM is conservatively assumed equal to PM10

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c) Process Operations, f or weight rates up to 60,000 lb/hr is determined using the following formula:

$$E = 4.1 * P^{0.67}$$

Where: E = allowable PM emission rate (lb/hr)
P = process weight rate (ton/hr)