INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 23, 2008

RE: Damon Corporation - Breckenridge / 039-25387-00285

FROM: Matthew Stuckey, 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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Damon Corporation - Breckenridge
656 North Delaware Street
Nappanee, Indiana 46550

(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.

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

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

Operation Permit No.: M039-25387-00285	
Issued by: *Original document signed by* Matt Stuckey, Branch Chief Permits Branch Office of Air Quality	Issuance Date: April 23, 2008 Expiration Date: April 23, 2018

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary recreational vehicle assembly plant.

Source Address:	656 North Delaware Street, Nappanee, Indiana 46550
Mailing Address:	656 North Delware Street, Nappanee, IN 46550
General Source Phone Number:	(574) 773-5353
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source 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

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

(a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

(1) One Vertical Panel saw.
(2) One Whirlwind Cutoff saw.
(3) One Table saw.
(4) Two Radial Arm saws.
(5) One Double Miter saw.

(b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).

(1) One Radial Arm Saw.
(2) One Table Saw

(c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device (located at Plant 5).

(1) Three Miter saws.
(2) Three Band Saws.
(3) Three Chop saws.

(d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts (located at Plant 5).

(1) ABS cement applied to drainpipe by brush.

(2) AH solvent free floor sealer applied to floors by roller.
(3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
(4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
(5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
(6) Spray can adhesive is used for installing fiberglass insulation.
(7) Putty tape and caulking are used for windows, doors and trim installation.
(8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
(9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
(10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

(e) Ten natural gas fired radiant space heaters (ID's R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19) (located at Plant 5).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M039-25387-00285, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 Certification

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) All terms and conditions of permits established prior to M039-25387-00285 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.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]

(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

C.14 Response to Excursions or Exceedances

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

(2) review of operation and maintenance procedures and records; 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

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

C.16 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS - Woodworking

Emissions Unit Description:

(a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

(1) One Vertical Panel saw.
(2) One Whirlwind Cutoff saw.
(3) One Table saw.
(4) Two Radial Arm saws.
(5) One Double Miter saw.

(b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).

(1) One Radial Arm Saw.
(2) One Table Saw

(c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device (located at Plant 5).

(1) Three Miter saws.
(2) Three Band Saws.
(3) Three Chop saws.

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

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

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), particulate emissions from the woodworking and cutting equipment, with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5), shall not exceed 1.83 pounds per hour when operating at a process weight of 600 pounds per hour.

Pursuant to 326 IAC 6-3-2, the cyclone dust collector (D1) for PM control shall be in operation at all times when the woodworking equipment of Section D.1(a) is being operated.

(b) Pursuant to 326 IAC 6-3-2(e), the allowable emissions from the wood cutting equipment connected to a Jet portable dust collector (located at Plant 10) which has a maximum process weight rate of less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-2(e), the Jet portable dust collector shall be in operation at all times the wood cutting equipment (located at Plant 10) is in operation in order to comply with this limit.

D.1.2 Preventative Maintenance Plan [326 IAC 2-4-4(9)]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the wood cutting equipment and its control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.4 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking and cutting equipment, with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

D.1.5 Visible Emissions Notations

(a) Visible emission notations of Stack No. D-1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.1.6 Broken or Failure Detection for the Cyclone

In the event that a cyclone failure has been observed:

A failed unit and the associated processes will 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).

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the cyclone stack exhaust daily.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of any failed or broken units of the cyclone.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Assembly Lines

Emissions Unit Description:

(d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts (located at Plant 5).

(1) ABS cement applied to drainpipe by brush.
(2) AH solvent free floor sealer applied to floors by roller.
(3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
(4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
(5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
(6) Spray can adhesive is used for installing fiberglass insulation.
(7) Putty tape and caulking are used for windows, doors and trim installation.
(8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
(9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
(10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2) the allowable particulate rate from the assembly line operation which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total VOC content of materials applied by the various methods in this section to the various assembly parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the assembly line operation and its control devices.

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

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

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

(2) The amount of coating material and solvent used less water on a monthly basis:

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

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

(3) The total VOC usage for each month;

(4) The total individual and combined HAP usage for each month;

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

D.2.5 Reporting Requirements

An annual summary of the monthly VOC usage to document compliance with Condition D.2.2 shall be submitted by April 15 of each year 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.

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
Annual Report

Source Name:	Damon Corporation - Breckenridge
Source Address:	656 North Delaware Street, Nappanee, Indiana 46550
Mailing Address:	656 North Delware Street, Nappanee, IN 46550
MSOP Permit No.:	M039-25387-00285
Source:	Two (2) recreational vehicle assembly lines
Pollutant:	VOC
Limit:	25 tons per consecutive twelve (12) month period, rolled on a monthly basis.

Year: _____

Month	VOC Usage for month (tons)	VOC Usage Previous 11 months (tons)	VOC Usage for 12 month period (tons)

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Damon Corporation - Breckenridge
Address:	656 North Delaware Street
City:	Nappanee, Indiana 46550
Phone #:	(574) 773-5353
MSOP #:	M039-25387-00285

I hereby certify that Damon Corporation - Breckenridge is : ☐ still in operation.
☐ no longer in operation.

I hereby certify that Damon Corporation - Breckenridge is : ☐ in compliance with the requirements of MSOP M039-25387-00285.
☐ not in compliance with the requirements of MSOP M039-25387-00285.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality
and Northern Regional Office

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

Source Background and Description

Source Name:	**Damon Corporation - Breckenridge**
Source Location:	**656 North Delaware Street, Nappanee, IN 46550**
County:	**Elkhart**
SIC Code:	**3792**
Permit Renewal No.:	**M039-25387-00285**
Permit Reviewer:	**Summer Keown**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Damon Corporation - Breckenridge relating to the operation of a recreational vehicle assembly plant.

History

On October 5, 2007, Damon Corporation - Breckenridge submitted applications to the OAQ requesting to renew its operating permit. Damon Corporation - Breckenridge was issued a MSOP, No. M039-16020-00285, on March 24, 2003.

Source Definition

Pursuant to Notice-Only Change No. 039-18558-00285, issued on March 30, 2004, this recreational vehicle assembly company consists of two (2) plants:

(a) Plant 5 is located at 656 North Delaware Street, Nappanee, Indiana.
(b) Plant 10 is located at 345 North Delaware Street, Nappanee, Indiana.

Pursuant to Notice-Only Change No. 039-18558-00285, issued on April 30, 2004, because the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

(a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

  (1) One Vertical Panel saw, constructed in 2003;
  (2) One Whirlwind Cutoff saw, constructed in 2003;
  (3) One Table saw, constructed in 1994;
  (4) Two Radial Arm saws, constructed in 1994; and
  (5) One Double Miter saw, constructed in 1998

(b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).

  (1) One Radial Arm Saw, constructed in 2004; and
  (2) One Table Saw, constructed in 2004

(c) Vinyl, metal and plastic trimming operation, constructed in 1998, with a maximum processing rate of 0.64 pounds per hour and not attached to a control device (located at Plant 5).

(1) Three Miter saws.
(2) Three Band Saws.
(3) Three Chop saws.

(d) Two (2) recreational vehicle assembly lines, constructed in 2004, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts (located at Plant 5).

(1) ABS cement applied to drainpipe by brush.
(2) AH solvent free floor sealer applied to floors by roller.
(3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
(4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
(5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
(6) Spray can adhesive is used for installing fiberglass insulation.
(7) Putty tape and caulking are used for windows, doors and trim installation.
(8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
(9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
(10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

(e) Ten natural gas fired radiant space heaters (ID's R10 thru R19), constructed in 1998, each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19) (located at Plant 5).

Existing Approvals

Since the issuance of the MSOP (039-16020-00285) on March 23, 2003, the source has constructed or has been operating under the following approvals as well:

(a) Notice-Only Change No. 039-18558-00285 issued on April 30, 2004

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
D-1	wood cutting	19	1.25	7,300	90
R10, R11, R12, R15, R16, R17, R18, R19	radiant space heaters	22	0.33	275,000 per stack	unknown
R13, R14	radiant space	26	0.33	275,000	unknown

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
	heaters			per stack	

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

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

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

(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 emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	40.89
PM-10	40.91
SO_2	0.00
VOC	45.44
CO	0.46
NO_x	0.55

HAPs	tons/year
Perchloroethylene	4.67
Hexane	4.63
Toluene	0.19
Total	9.52

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants, after controls, is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less 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 less than twenty-five (25) tons per year.

(c) Fugitive Emissions
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

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	0
SO_2	Not Reported
VOC	6
CO	Not Reported
NO_x	Not Reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)							
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**Single HAP**	**Total HAPs**
Surface Coating	2.95	2.95	0.00	45.41	0.00	0.00	4.67	9.51
Woodworking	7.00	7.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.01	0.03	0.00	0.03	0.46	0.55	0.00	0.01
Total Emissions	9.96	9.98	0.00	<25*	0.46	0.55	4.67	9.52
Major Source Threshold	250	250	250	250	250	250	10	25

*The source has agreed to limit VOC emissions to less than twenty-five (25) tons per year.

(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

The following federal rules are applicable to the source:

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

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)[326 IAC 14 and 40 CFR Part 63] applicable to this source.

(c) 40 CFR Part 63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations)
This source is not subject to 40 CFR Part 63 Subpart JJ because this source does not manufacture wood furniture or wood furniture components as defined by Subpart JJ.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The potential to emit of all criteria pollutants is less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable to this source.

326 IAC 2-3 (Emission Offset)
The unrestricted potential emissions of VOC and NOx are less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable to this source.

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

326 IAC 2-4.1-1 (New Source Toxics Control)
This source emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of all HAPs, therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4-2 (Fugitive Dust Emissions: Emission Limitations)

A source generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if either of the following criteria are violated:

(a) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period, or

(b) If fugitive dust is visible crossing the boundary or property line of a source.

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

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source does not have fugitive emissions exceeding twenty-five (25) tons per year.

State Rule Applicability – Individual Facilities

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

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

(a) A single hazardous pollutant (HAP) is less than 10 tons per year, and

(b) Any combination of HAPs is less than 25 tons per year.

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

(a) Pursuant to 326 IAC 6-3-2(c), particulate emissions from the woodworking and cutting equipment, with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5), shall not exceed 1.83 pounds per hour when operating at a process weight of 600 pounds per hour.

This limit was calculated using the following formula:

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

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

The cyclone dust collector shall be in operation at all times the wood cutting operation is in operation, in order to comply with this limit.

(b) The particulate from the wood cutting operation of Plant 10 shall be limited by the following:

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from the woodworking operations (located at Plant 10) which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The Jet portable dust collector shall be in operation at all times the wood cutting operation in Plant 10 is in operation in order to comply with this limit.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County) applies to sources located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, and Wayne counties. This source is located in Elkhart County. Therefore, 326 IAC 6.5 does not apply to this source.

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

This source has agreed to limit VOC usage to less than twenty-five (25) tons per twelve (12) consecutive month period. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This source is not subject to the requierements of 326 IAC 8-2-9 because this rule applies to the coating of metal parts and all metal parts for this source as received pre-coated.

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

This source is not subject to the requirements of 326 IAC 8-2-12 because this rule applies to cabinet wood parts of the product. There are no coatings applied to cabinets, as the cabinets come pre-stained of vinyl-wrapped. The rest of the wood in the product that receives coatings is structural wood and not subject to this rule.

326 IAC 8-11-3 (Wood Furniture Coating: Emission Limits)

This source is not subject to the requirements of 326 IAC 8-11-3 because this source only applies surface coating to interior wood and gypsum walls of manufactured homes and not to wood furniture.

Compliance Determination and Monitoring Requirements

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

The woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1)(located at Plant 5) has applicable compliance determination conditions as specified below:

(a) An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking and cutting equipment, with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

(b) Visible Emissions Notations

(1) Visible emission notations of Stack No. D-1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(2) 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.

(3) 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.

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

(5) 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.

Recommendation

The staff recommends to the Commissioner that the MSOP 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 application for the purposes of this review was received on October 5, 2007.

Conclusion

The operation of this recreational vehicle assembly plant shall be subject to the conditions of the attached MSOP Renewal No. 039-25387-00285.

Appendix A: Emissions Calculations (PM and PM-10)
from Wood and Non-Wood Cutting Operations

Company Name: Damon Corporation - Breckenridge
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
Permit Number: M039-25387-00285
Plt ID: 039-00285
Reviewer: Summer Keown
Date: January 7, 2008

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Nat. Gas Combustion	Total
PM	2.95	37.93	0.01	40.89
PM-10	2.95	37.93	0.03	40.91
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.55	0.55
VOC	45.41	0.00	0.03	45.44
CO	0.00	0.00	0.46	0.46
Total HAPs	9.51	0.00	0.01	9.52
Worst Case Single HAP	4.67	0.00	0.01	4.68
	(perchloroethylene)		(hexane)	

Total emissions based on rated capacity at 8,760 hours/year

Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Nat. Gas Combustion	Total
PM	2.95	7.00	0.01	9.96
PM-10	2.95	7.00	0.03	9.98
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.55	0.55
VOC	45.41	0.00	0.03	45.44
CO	0.00	0.00	0.46	0.46
Total HAPs	9.51	0.00	0.01	9.52
Worst Case Single HAP	4.67	0.00	0.01	4.68
	(perchloroethylene)		(hexane)	

Total emissions based on rated capacity at 8.760 hours/year, after control

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

Company Name: Damon Corporation - Breckenridge
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
Permit Number: M039-25387-00285
Plt ID: 039-00285
Reviewer: Summer Keown
Date: January 7, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Geocel 2300	8.4	42.00%	0.0%	42.0%	0.0%	22.10%	0.47000	1.500	3.53	3.53	2.49	59.69	10.89	0.00	15.96	100%
Dicore LS502	9.9	33.00%	0.0%	33.0%	0.0%	0.00%	0.22000	1.500	3.27	3.27	1.08	25.87	4.72	0.00	0.00	100%
Bostic Super Tac	5.8	77.50%	0.0%	77.5%	0.0%	17.00%	0.35000	1.500	4.50	4.50	2.36	56.64	10.34	2.53	26.44	15%
Oatey ABS Cem	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	0.01800	1.500	5.33	5.33	0.14	3.45	0.63	0.00	0.00	100%
Brake Cleaner	6.3	74.00%	0.0%	74.0%	0.0%	0.00%	0.02000	1.500	4.66	4.66	0.14	3.36	0.61	0.18	0.00	15%
Bostic Caulk 900	10.1	9.00%	0.0%	9.0%	0.0%	0.00%	0.00400	1.500	0.91	0.91	0.01	0.13	0.02	0.00	0.00	100%
Mineral Spirits	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.33000	1.500	6.50	6.50	3.22	77.22	14.09	0.00	0.00	100%
Glass Cleaner	8.0	10.00%	0.0%	10.0%	0.0%	0.00%	0.01700	1.500	0.80	0.80	0.02	0.49	0.09	0.24	0.00	70%
AH Solvent Sealer	8.6	1.95%	0.0%	2.0%	0.0%	1.95%	0.01300	1.500	0.17	0.17	0.00	0.08	0.01	0.00	8.60	100%
Shingle Tite Mast	8.1	30.00%	0.0%	30.0%	0.0%	0.00%	0.25000	1.500	2.43	2.43	0.91	21.87	3.99	0.00	0.00	100%
State Potential Emissions			**Add worst case coating to all solvents**								**10.37**	**248.80**	**45.41**	**2.95**		

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Damon Corporation - Breckenridge
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
Permit Number: M039-25387-00285
Plt ID: 039-00285
Permit Reviewer: Summer Keown
Date: January 7, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene / Diethylene Glyco	Weight % Perchloroethylene	Weight % Ethyl Benzene	Weight % Hexane	Weight % Methylene Bis Iso (MDI)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	MDI Emissions (ton/yr)
Geocel 2300	8.41	0.470000	1.50	0.00%	0.00%	17.98%	0.00%	0.00%	0.00%	0.00	0.00	4.67	0.00	0.00	0.00
AH Sealer	8.60	0.013000	1.50	0.00%	1.95%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00
Bostic Supertac	5.75	0.350000	1.50	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.00	0.00	0.00	4.63	0.00
Brake Cleaner	6.33	0.020000	1.50	0.00%	21.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.17	0.00	0.00	0.00	0.00
BosticCaulk90	10.1	0.004000	1.50	7.00%	0.00%	0.00%	1.50%	0.00%	1.00%	0.02	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions										**0.02**	**0.19**	**4.67**	**0.00**	**4.63**	**0.00**

METHODOLOGY **Total HAPs =** **9.51**

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ten space heaters rated 0.125 MMBtu per hour each

Company Name: Damon Corporation - Breckenridge
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
Permit Number: M039-25387-00285
Permit ID: 039-00285
Reviewer: Summer Keown
Date: January 7, 2008

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.25	11.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.03	0.00	0.55	0.03	0.46

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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

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

See page 5 for HAPs emissions calculations.

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

Company Name: Damon Corporation - Breckenridge
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
Permit Number: M039-25387-00285
Plt ID: 039-00285
Reviewer: Summer Keown
Date: January 7, 2008

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.150E-05	6.570E-06	4.106E-04	9.855E-03	1.862E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.738E-06	6.023E-06	7.665E-06	2.081E-06	1.150E-05

Methodology is the same as page 1.

Total HAPs: 0.01

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

Appendix A: Emissions Calculations (PM and PM-10)
from Wood and Non-Wood Cutting Operations

Company Name:	**Damon Corporation - Breckenridge**
Address City IN Zip:	**656 N. Delaware, Nappanee, IN 46550**
Permit Number:	**M039-25387-00285**
Plt ID:	**039-00285**
Reviewer:	**Summer Keown**
Date:	**January 7, 2008**

Facility Descriptions:

(a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).

(1) One Vertical Panel saw.
(2) One Whirlwind Cutoff saw.
(3) One Table saw.
(4) Two Radial Arm saws.
(5) One Double Miter saw.

(b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).

(1) One Radial Arm Saw.
(2) One Table Saw

(c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.

(1) Three Miter saws.
(2) Three Band Saws.
(3) Three Chop saws.

Potential Emissions:

(a) For wood cutting operations that are attached to a control device.

The following calculations determine the PM emissions from the wood cutting operations attached to dust collector D-1.

Uncontrolled emissions = (amount collected lb/hr) / (control efficiency) * (8760 hours/year) * (1 ton/2000 lbs)
Uncontrolled emissions = (9 lbs/hr) / (85% control efficiency) = **10.59 lbs/hr**
(10.59 lbs/hr) * (8760 hrs/year) * (1 ton/2000 lbs) = **33.507 tons/yr**

Controlled emissions = (Uncontrolled emission rate lb/hr) * (1-control efficiency) * (8760 hrs/year) * (1 ton/2000 lbs)
Controlled emissions = (10.59 lbs/hr) * (1-0.85) = **1.59 lbs/hr**
(1.59 lbs/hr) * (8760 hrs/year) * (1 ton/2000 lbs) = **6.96 tons/year**

(b) For wood cutting operations that are attached to a control device.

The following calculations determine the PM emissions from the wood cutting operations attached to a Jet portable dust collector based on the amount of dust collected:

Uncontrolled emissions = (amount collected lb/hr) / (control efficiency) * (8760 hours/year) * (1 ton/2000 lbs)
Uncontrolled emissions = (1 lb/hr) / (99% control efficiency) = **1.01 lb/hr**
(1.01 lb/hr) * (8760 hours/year) * (1 ton/2000 lbs) = **4.42 tons/year**

Controlled emissions = (Uncontrolled emission rate lb/hr) * (1-control efficiency) * (8760 hrs/year) * (1 ton/2000 lbs)
Controlled emissions = (1.01 lb/hr) * (1-control efficiency) = **0.01 lb/hr**
(0.01 lb/hr) * (8760 hours/year) * (1 ton/2000 lbs) = **0.04 tons/year**

(c) For trimming operations, other than wood cutting, the potential emissions are negligible since the type of dust created is not "airborne"

Total PM/PM10 Potential Emissions for wood cutting operations =

Uncontrolled Emissions = 33.507 + 4.42 = **37.93 tons per year**
Controlled Emissions = 6.96 + 0.04 = **7.0 tons per year**