



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 2, 2008

RE: Vintage Trailer, Ltd. / 039-25499-00575

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  
(800) 451-6027  
www.IN.gov/idem

## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Vintage Trailers, Ltd.  
4660 Pine Creek Road  
Elkhart, Indiana 46516**

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

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.: M039-25499-00575	
Issued by:  <i>Original signed by Iryn Calilung for Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality</i>	Issuance Date: April 2, 2008  Expiration Date: April 2, 2018

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1    General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2    Emission Units and Pollution Control Equipment Summary	
<b>B. GENERAL CONDITIONS .....</b>	<b>6</b>
B.1    Definitions [326 IAC 2-1.1-1]	
B.2    Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3    Term of Conditions [326 IAC 2-1.1-9.5]	
B.4    Enforceability	
B.5    Severability	
B.6    Property Rights or Exclusive Privilege	
B.7    Duty to Provide Information	
B.8    Certification	
B.9    Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10   Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11   Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12   Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13   Permit Renewal [326 IAC 2-6.1-7]	
B.14   Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15   Source Modification Requirement	
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]	
B.17   Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18   Annual Fee Payment [326 IAC 2-1.1-7]	
B.19   Credible Evidence [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>11</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1    Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2    Permit Revocation [326 IAC 2-1.1-9]	
C.3    Opacity [326 IAC 5-1]	
C.4    Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5    Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6    Fugitive Dust Emissions [326 IAC 6-4]	
C.7    Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.8    Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9    Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.10   Compliance Monitoring [326 IAC 2-1.1-11]	
C.11   Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12   Instrument Specifications [326 IAC 2-1.1-11]	
<b>Corrective Actions and Response Steps</b>	
C.13   Actions Related to Noncompliance Demonstrated by a Stack Test	

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

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]  
[IC 13-14-1-13]

**D.1 EMISSIONS UNIT OPERATION CONDITIONS..... 16**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Particulate [326 IAC 6-3-2(d)]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

**Compliance Determination Requirements**

- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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

- D.1.5 Record Keeping Requirement

**D.2 EMISSIONS UNIT OPERATION CONDITIONS..... 18**

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

**Compliance Determination Requirements**

- D.2.2 Particulate Control

Annual Notification ..... 19  
Certification ..... 20  
Malfunction Report ..... 21

## 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 custom recreational vehicle trailer manufacturing source.

Source Address:	4660 Pine Creek Road, Elkhart, Indiana 46516
Mailing Address:	4660 Pine Creek Road, Elkhart, Indiana 46516
General Source Phone Number:	(574) 522-2261
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD 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) One (1) frame coating booth, identified as EU-01, constructed in 1992 and re-constructed in 2003, equipped with an airless spray system and dry filters for particulate control, exhausting to Stacks SV-01 through SV-03, capacity: 0.75 trailer frames per hour.
- (b) One (1) fabrication and final finish operation, identified as EU-02, constructed in 1992, using caulk guns and aerosol cans to apply materials, capacity: 0.75 travel trailers per hour.
- (c) Seventeen (17) radiant tube heaters, identified as H-01 through H-17, constructed in 1992, exhausting to Stacks H-01 through H-16, heat input capacity: 0.1 million British thermal units per hour, each.
- (d) Three (3) Metal Inert Gas (MIG) welding stations, constructed in 1992, capacity: 0.35 spools of wire per hour, each, and one (1) Tungsten Inert Gas (TIG) welding station constructed in 2006.
- (e) One (1) Oxyacetylene welding station, constructed in 1992, capacity: 1.65 pounds of metal consumed per hour.
- (f) One (1) plasma cutter, constructed in 1992, capacity: 120 inches of one-eighth inch thick cuts in metal per hour.

- (g) One (1) woodworking and metal working operation, identified as F-01, constructed in 1992, with a capacity of 200.9 board feet (502.25 pounds) per hour, including:
  - (1) three (3) ten inch table saws, equipped with three (3) bag filters;
  - (2) two (2) chop saws; and
  - (3) hand-held saws, grinders and drills.

## **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, M039-25499-00575, 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 M039-25499-00575 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 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.8 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.9 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.10 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

---

- (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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

---

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

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

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

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

---

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

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

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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

### Emissions Unit Description:

- (a) One (1) frame coating booth, identified as EU-01, constructed in 1992 and re-constructed in 2003, equipped with an airless spray system and dry filters for particulate control, exhausting to Stacks SV-01 through SV-03, capacity: 0.75 trailer frames per hour.
- (b) One (1) fabrication and final finish operation, identified as EU-02, constructed in 1992, using caulk guns and aerosol cans to apply materials, capacity: 0.75 travel trailers per hour.

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the one (1) frame coating booth (EU-01) and one (1) fabrication and final finish operation (EU-02) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2:

- (a) Particulate from the one (1) frame coating booth, identified as EU-01, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]**

---

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

**Compliance Determination Requirements**

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

---

Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [(\Sigma C \times U) / \Sigma U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied;  
and U is the usage rate of the coating in gallons per day.

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

**D.1.5 Record Keeping Requirement**

---

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a daily 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 solvent; and
  - (3) The volume weighted average VOC content of the coatings used for each day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (g) One (1) woodworking and metal working operation, identified as F-01, constructed in 1992, with a capacity of 200.9 board feet (502.25 pounds) per hour, including:
- (1) three (3) ten inch table saws, equipped with three (3) bag filters;
  - (2) two (2) chop saws; and
  - (3) hand-held saws, grinders and drills.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking and metal working operation, identified as F-01, excluding the hand-held saws, grinders and drills, shall not exceed 1.62 pounds per hour, when operating at a process weight rate of 502.25 pounds per hour. The pounds per hour limitation was calculated using the following equation:

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

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

### Compliance Determination Requirements

#### D.2.2 Particulate Control

In order to comply with Condition D.2.1, the three (3) bag filters for particulate control shall be in operation and control emissions from the three (3) ten inch table saws at all times that the table saws are in operation.

**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).

<b>Company Name:</b>	Vintage Trailers, Ltd.
<b>Address:</b>	4660 Pine Creek Road
<b>City:</b>	Elkhart, Indiana 46516
<b>Phone #:</b>	(574) 522-2261
<b>MSOP #:</b>	M039-25499-00575

I hereby certify that Vintage Trailers, Ltd. is :

still in operation.

no longer in operation.

I hereby certify that Vintage Trailers, Ltd. is :

in compliance with the requirements of MSOP M039-25499-00575.

not in compliance with the requirements of MSOP M039-25499-00575.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
MINOR SOURCE OPERATING PERMIT  
CERTIFICATION**

Source Name: Skyline Corporation  
Source Address: 401 County Road 15 South, Elkhart, Indiana 46515  
Mailing Address: P.O. Box 743, Elkhart, Indiana 46515  
MSOP No.: M039-24905-00306

**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:

Phone:

Date:

**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:

---

---

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

**Company Name: Vintage Trailers, Ltd.  
Address: 4660 Pine Creek Road, Elkhart, Indiana 46516  
MSOP Renewal: 039-25499-00575  
Plt ID: 039-00575  
Reviewer: Roger Osburn  
Date: November 13, 2007**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Frame Coating (EU-01)</b>																
PPG 9457 (supplied as 9467)	8.29	29.0%	0.00%	29.0%	0.00%	33.0%	1.375	0.750	2.40	2.40	2.48	59.50	10.86	3.09	7.29	75.0%

Potential to Emit

Add worst case coating to all solvents

PM	Control Efficiency	90.0%				
	<b>Uncontrolled</b>	<b>2.48</b>	<b>59.5</b>	<b>10.9</b>	<b>3.09</b>	
	<b>Controlled</b>	<b>2.48</b>	<b>59.5</b>	<b>10.9</b>	<b>3.09</b>	

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Fabrication and Final Finish (EU-02)</b>																
502 Caulk	8.51	5.00%	0.00%	5.00%	0.00%	95.0%	1.04	0.750	0.426	0.43	0.332	7.97	1.45	0.0	0.45	100.0%
Rust-oleum 1679	9.01	95.0%	0.00%	95.0%	0.00%	5.00%	0.110	0.750	8.56	8.56	0.706	16.95	3.09	0.0814	171.19	50.0%

Potential to Emit

Add worst case coating to all solvents

PM	Control Efficiency	0.0%				
	<b>Uncontrolled</b>	<b>1.04</b>	<b>24.9</b>	<b>4.55</b>	<b>0.081</b>	
	<b>Controlled</b>	<b>1.04</b>	<b>24.9</b>	<b>4.55</b>	<b>0.081</b>	

<b>Overall Totals</b>	Uncontrolled	<b>3.52</b>	<b>84.4</b>	<b>15.4</b>	<b>3.17</b>
	Controlled	<b>3.52</b>	<b>84.4</b>	<b>15.4</b>	<b>0.390</b>

**METHODOLOGY**

PPG 9457 also contains 38% acetone, which is not a VOC and not particulate.  
Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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:** Vintage Trailers, Ltd.  
**Address:** 4660 Pine Creek Road, Elkhart, Indiana 46516  
**MSOP Renewal:** 039-25499-00575  
**Plt ID:** 039-00575  
**Reviewer:** Roger Osburn  
**Date:** November 13, 2007

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
<b>Frame Coating (EU-01)</b>											
PPG 9457 (supplied as 9467)	8.29	1.375	0.750	19.0%	0.00%	4.00%	3.00%	7.11	0.00	1.50	1.12
<b>Fabrication and Final Finish (EU-02)</b>											
502 Caulk	8.51	1.04	0.750	0.0%	0.0%	0.0%	0.0%	0.000	0.000	0.000	0.000
Rust-oleum 1679	9.01	0.110	0.750	10.0%	30.0%	5.00%	0.00%	0.326	0.977	0.163	0.000
								<b>7.44</b>	<b>0.977</b>	<b>1.66</b>	<b>1.12</b>
										<b>Overall Total</b>	<b>11.2</b>

**METHODOLOGY**

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

Appendix A: Welding and Thermal Cutting

Company Name: Vintage Trailers, Ltd.  
 Address: 4660 Pine Creek Road, Elkhart, Indiana 46516  
 MSOP Renewal: 039-25499-00575  
 Plt ID: 039-00575  
 Reviewer: Roger Osburn  
 Date: November 13, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Electrode Consumption	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(ER70S-4)	3.00	3.03		0.005	3.40E-05	1.00E-06	1.00E-06	0.046	3.09E-04	9.10E-06	9.10E-06	3.28E-04
Oxyacetylene(carbon steel)	1.00	1.65		0.00550				0.009				
Tungsten Inert Gas (TIG)	1.00	8.75	8.75	0.00520	3.18E-04	1.00E-06	1.00E-06	0.046	2.78E-03	8.75E-06	8.75E-06	2.80E-03
FLAME CUTTING												
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma	1.00	0.125	2.00	0.1622	0.0005	0.0001	0.0003	0.020	6.25E-05	1.25E-05	3.75E-05	1.13E-04
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.120	0.003	0.000	0.000	0.0032
Potential Emissions lbs/day								2.89	0.076	0.001	0.001	0.078
Potential Emissions tons/year								0.527	0.014	0.000	0.000	0.014

METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

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

**Company Name: Vintage Trailers Ltd.**  
**Address : 4660 Pine Creek Road, Elkhart, Indiana 46516**  
**MSOP Renewal: 039-25499-00575**  
**Plt ID: 039-00575**  
**Reviewer: Roger Osburn**  
**Date: November 13, 2007**

Seventeen (17) radiant tube heaters rated at 0.1 MMBtu/hr, each.

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr

1.70	14.9
------	------

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.014	0.057	0.004	0.745	0.041	0.625

\*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: Vintage Trailers Ltd.  
 Address: 4660 Pine Creek Road, Elkhart, Indiana 46516  
 MSOP Renewal: 039-25499-00575  
 Plt ID: 039-00575  
 Reviewer: Roger Osburn  
 Date: November 13, 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	1.56E-05	8.94E-06	5.58E-04	1.34E-02	2.53E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	3.72E-06	8.19E-06	1.04E-05	2.83E-06	1.56E-05	0.014

Methodology is the same as page 4.

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: Emission Calculations  
Woodworking and Metalworking Operations**

**Company Name:** Vintage Trailers, Ltd.  
**Address:** 4660 Pine Creek Road, Elkhart, Indiana 46516  
**MSOP Renewal:** 039-25499-00575  
**Plt ID:** 039-00575  
**Reviewer:** Roger Osburn  
**Date:** November 13, 2007

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Bagfilter 1	98.0%	0.03	130	1.67	7.32	0.03	0.15
Bagfilter 2	98.0%	0.03	130	1.67	7.32	0.03	0.15
Bagfilter 3	98.0%	0.03	300	3.86	16.89	0.08	0.34
				<b>7.20</b>	<b>31.5</b>	<b>0.144</b>	<b>0.631</b>

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Vintage Trailers, Ltd.</b>
<b>Source Location:</b>	<b>4660 Pine Creek Road, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3792</b>
<b>Renewal Permit No.:</b>	<b>MSOP 039-25499-00575</b>
<b>Permit Reviewer:</b>	<b>Roger Osburn</b>

The Office of Air Quality (OAQ) has reviewed an application from Vintage Trailers, Ltd., relating to the permit renewal of a custom recreational vehicle trailer manufacturing source.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) frame coating booth, identified as EU-01, constructed in 1992 and re-constructed in 2003, equipped with an airless spray system and dry filters for particulate control, exhausting to Stacks SV-01 through SV-03, capacity: 0.75 trailer frames per hour.
- (b) One (1) fabrication and final finish operation, identified as EU-02, constructed in 1992, using caulk guns and aerosol cans to apply materials, capacity: 0.75 travel trailers per hour.
- (c) Seventeen (17) radiant tube heaters, identified as H-01 through H-17, constructed in 1992, exhausting to Stacks H-01 through H-16, heat input capacity: 0.1 million British thermal units per hour, each.
- (d) Three (3) Metal Inert Gas (MIG) welding stations, constructed in 1992, capacity: 0.35 spools of wire per hour, each, and one (1) Tungsten Inert Gas (TIG) welding station constructed in 2006.
- (e) One (1) Oxyacetylene welding station, constructed in 1992, capacity: 1.65 pounds of metal consumed per hour.
- (f) One (1) plasma cutter, constructed in 1992, capacity: 120 inches of one-eighth inch thick cuts in metal per hour.
- (g) One (1) woodworking and metal working operation, identified as F-01, constructed in 1992, with a capacity of 200.9 board feet (502.25 pounds) per hour, including:
  - (1) three (3) ten inch table saws, equipped with three (3) bag filters;
  - (2) two (2) chop saws; and
  - (3) hand-held saws, grinders and drills.

**Existing Approvals**

Since March 10, 2003, the source has been operating under the following approval: MSOP 039-16783-00575.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
H-01 through H-17	Infrared Tube Heaters	24.0	0.5	100	200
SV-01	Frame Coating Room	10.0	1.66	2300	Ambient
SV-02	Frame Coating	ground level	1.66	1500	Ambient
SV-03	Frame Coating	ground level	1.66	1500	Ambient

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See pages 1 through 6 of 6 of Appendix A of this document for detailed emissions calculations.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA

has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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 for the 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 for the 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.

**Unrestricted Potential Emissions**

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	40.0
PM <sub>10</sub>	40.0
SO <sub>2</sub>	0.004
VOC	15.4
CO	0.589
NO <sub>x</sub>	0.701

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
Xylene	7.44
Toluene	0.977
Ethyl benzene	1.66
Glycol Ethers	1.12
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	0.001
Hexane	0.013
Lead	negligible
Cadmium	negligible
Chromium	negligible
Manganese	0.001

Nickel	negligible
TOTAL	11.2

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants 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 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 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**Actual Emissions**

No previous emission data has been received from the source.

**Limited Potential to Emit**

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

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Frame Coating Booth (EU-01)	3.09	3.09	-	10.9	-	-	7.11 individual 9.73 total
Fabrication and final finish operations (EU-02)	0.081	0.081	-	4.55	-	-	0.977 individual 1.47 total
Radiant tube heaters, identified as H-01 through H-17	0.013	0.053	0.004	0.039	0.589	0.701	0.013 individual 0.013 total
Welding and plasma cutting	0.714	0.714	-	-	-	-	0.001 individual 0.001 total
Wood working and metal working (F-01)	7.10	7.10	-	-	-	-	-
Total Emissions	11.0	11.0	0.004	15.5	0.589	0.701	7.44 individual 11.2 total

The potential to emit each pollutant is equal to the unrestricted potential emissions, except for particulate. The hourly particulate emissions from the woodworking and metal working are limited by 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes. The PM and PM<sub>10</sub> values in this table is the maximum annual potential to emit based on operating at the limited hourly rate 8,760 hours per year.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.
- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

**State Rule Applicability - Entire Source**

326 IAC 2-6 (Emission Reporting)

This source is not required to have a Part 70 permit and it is not located in Lake, Porter, or LaPorte Counties. Therefore, 326 IAC 2-6 does not apply.

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

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

### State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the one (1) frame coating booth (EU-01) and one (1) fabrication and final finish operation (EU-02) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the one (1) frame coating booth (EU-01) and one (1) fabrication and final finish operation (EU-02) are in compliance with this requirement when using daily volume weighted averaging. This limitation will be calculated based on a daily volume-weighted average. This volume weighted average shall be determined by the following equation:

$$A = [(\sum C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied;  
and U is the usage rate of the coating in gallons per day.

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

Pursuant to 326 IAC 6-3-2,

- (a) Particulate from the one (1) frame coating booth (EU-01) shall be controlled by a dry particulate filter or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) The one (1) fabrication and final finish operation (EU-02) uses caulking, which is a form of flow coating, to apply products, and aerosol coating products to repair minor surface damage and imperfections. Therefore, pursuant to 6-3-1(b)(7) and (12), this facility is exempt from the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.
- (c) The welding operations at this source consume less than six hundred twenty-five (625) pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.
- (d) The flame cutting operation at this source cuts less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less. Therefore, pursuant to 326 IAC 6-3-1(b)(10), the flame cutting operation is exempt from the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.
- (e) The hand-held saws, grinders and drills are trivial activities based on the definition in 326 IAC 2-7-1(40)(F)(v), (vi) and (xi). Therefore, pursuant to 326 IAC 6-3-1(b)(13), the hand-held saws, grinders and drills are exempt from the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.
- (f) The particulate emissions from the one (1) woodworking and metal working operation, identified as F-01, excluding the hand-held saws, grinders and drills, shall be limited to 1.62 pounds per hour, when operating at a process weight rate of 502.25 pounds per hour. The potential to emit particulate from the three (3) controlled table saws are 7.20 pounds per hour before controls and 0.144 pound per hour after controls. According to information provided by the applicant, the emissions from the uncontrolled chop saws are less than 1.04 pounds per hour. Therefore, the one (1) woodworking and metal working operation, identified as F-01, will comply with this rule. The three (3) bagfilters must be in operation and control emissions from the saws exhausting to the bagfilter at all times when the saws are in operation. The limitation is based upon the following equation:

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

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

### 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 November 2, 2007.

**Conclusion**

The operation of this custom recreational vehicle trailer manufacturing source shall be subject to the conditions of the attached MSOP Renewal No. 039-25499-00575.