



# 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: January 30, 2009

RE: Damon Corporation / 039-27082-00683

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



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## New Source Review (NSR) and Minor Source Operating Permit (MSOP) OFFICE OF AIR QUALITY

**Damon Corporation  
604 Middleton Run 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.: M039-27082-00683                                                                                                                                      |                                                                          |
| Issued by<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: January 30, 2009<br><br>Expiration Date: January 30, 2014 |

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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)]

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

|                              |                                                                                                                                                                               |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source Address:              | 604 Middleton Run Road, Elkhart, Indiana 46516                                                                                                                                |
| Mailing Address:             | P.O. Box 2888, Elkhart, IN 46515-2888                                                                                                                                         |
| General Source Phone Number: | 574-584-3946                                                                                                                                                                  |
| SIC Code:                    | 3716                                                                                                                                                                          |
| County Location:             | Elkhart                                                                                                                                                                       |
| Source Location Status:      | Attainment for all criteria pollutants                                                                                                                                        |
| Source Status:               | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) chassis preparation operation, identified as CP1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal vehicle chassis, plastic pipes & boxes, using no control equipment, and exhausting indoors;
- (b) One (1) subfloor installation operation, identified as SF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal flooring, using no control equipment, and exhausting indoors;
- (c) One (1) assembly line operation, identified as ALO1, approved for construction in 2008, where surface coating is applied by hand and aerosol cans to plastic and wood parts of recreational vehicles as they are assembled, using no control equipment, and exhausting indoors;
- (d) One (1) undercoat bay, identified as UC1, approved for construction in 2008, where low pressure, non-atomizing flow is used to coat the metal underside of a recreational vehicle chassis, using dry filters to control particulate emissions, and exhausting to stack UC-S1. UC-S1 has a control efficiency of 95% and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of five thousand (5,000) actual cubic feet per minute;
- (e) One (1) touch-up paint operation, identified as TP1, with a maximum capacity of five (5) gallons/day, applied by HVLP and hand, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) Four (4) high volume low pressure (HVLP) spray guns, identified as SG1-SG4, for application of basecoat and clearcoat surface coatings to plastic, each with a maximum capacity to spray 1.25 gallons/hour.

- (f) One (1) final finish operation, identified as FF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, utilizing hand or aerosol cans to apply non-halogenated organic solvent cleaners and degreasers to plastic, wood, vinyl, and/or glass surfaces, using no control equipment, and exhausting indoors.
- (g) One (1) woodworking operation, identified as WW, with a total maximum capacity to cut one thousand three hundred (1300) pounds of wood per hour, using fabric filters to control particulates, and exhausting indoors. This operation consists of the following equipment:
  - (1) Five (5) miter saws, identified as MS4-MS8, approved for construction in 2008, each with a maximum capacity to cut fifty (50) pounds of wood per hour, each using an attached dust collector, identified as DC3 - DC7, each rated at 1,300 acfm, respectively, and exhausting indoors.
  - (2) One (1) table saw, identified as TS3, approved for construction in 2008, with a maximum capacity to cut fifty (50) pounds of wood per hour, using attached dust collector, identified as DC8, rated at 1,300 acfm, and exhausting indoors.
  - (3) Two (2) woodworking stations, identified as Stations 1 & 2, approved for construction in 2008, each using separate station-wide dust collection systems and exhausting indoors. Consisting of the following equipment:
    - (A) Station 1 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC1, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS1;
      - (ii) One (1) radial arm saw, RA1;
      - (iii) One (1) table saw, TS1;
      - (iv) One (1) pin router, PR1;
      - (v) One (1) belt sander, BTS1;
      - (vi) One (1) miter saw, MS1.
    - (B) Station 2 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC2, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS2,
      - (ii) One (1) radial arm saw, RA2,
      - (iii) One (1) table saw, TS2,
      - (iv) One (1) pin router, PR2,
      - (v) One (1) belt sander, BTS2,
      - (vi) Two (2) miter saws , MS2 & MS3.
- (h) One (1) gasoline fuel storage and dispensing operation, identified as GT1, approved for construction in 2008, having a storage capacity of 1,000 gallons, and dispensing less than or equal to 100 gallons per day, with uncontrolled emissions.

Under NESHAP 40 CFR 63 Subpart CCCCCC, the one (1) gasoline fuel storage tank GT1 is considered an affected source as part of a new gasoline dispensing facility.

- (i) One (1) diesel fuel storage and dispensing operation, identified as DT1, approved for construction in 2008, having a storage capacity of 500 gallons, and dispensing less than or equal to 500 gallons per day, with uncontrolled emissions.
- (j) One (1) welding and thermal cutting operation, identified as WC1, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) One (1) metal inert gas (MIG) welding station, approved for construction in 2008, using E70S-3 wire, with a maximum consumption of 0.85 pounds of wire per hour;
  - (2) One (1) plasma cutting station, approved for construction in 2008, where the maximum metal thickness cut is 0.37 inches and the maximum metal cutting rate is 12 inches/minute;
  - (3) One (1) oxyacetylene cutting station, approved for construction in 2008, where the maximum metal thickness cut is 0.75 inches and the maximum metal cutting rate is 12 inches/minute.
- (k) One (1) miscellaneous cutting operation, identified as MPE1, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) One (1) abrasive chop saw, identified as MPE1, approved for construction in 2008, with a maximum capacity to cut 50 pounds of steel pipe per hour.
  - (2) Two (2) aluminum chop/miter saws, identified as MPE2 & MPE3, approved for construction in 2008, with a maximum capacity to cut 25 pounds of aluminum trim per hour.
  - (3) Three (3) band saws, identified as MPE4 - MPE6, approved for construction in 2008, with a maximum capacity to cut 10 pounds of wood per hour.
  - (4) Two (2) miter saws, identified as MPE7& MPE8, approved for construction in 2008, with a maximum capacity to cut 15 pounds of plastic pipe per hour.
- (l) Space heaters, process heaters, or make-up air units using the following fuels:
  - (1) Natural gas-fired combustion sources with the combined heat input of 4.80 million British thermal units per hour (MMBtu/hr).
- (m) Paved roads and parking lots with public access.

## SECTION B GENERAL CONDITIONS

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

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

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- (a) This permit, M039-27082-00683, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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

#### B.8 Certification

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- (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)]

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- (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]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

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

- (a) All terms and conditions of permits established prior to M039-27082-00683 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 one hundred twenty (120) 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 one hundred twenty (120) 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]**

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- (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**

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

**B.16 Inspection and Entry**

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[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]

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

- (a) Enter upon the Permittee's premises where a 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]**

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- (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]**

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- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (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]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(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]

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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]**

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

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

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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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]**

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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]**

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- (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 Response to Excursions or Exceedances**

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

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- (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.15 Malfunctions Report [326 IAC 1-6-2]**

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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.16 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 or ninety (90) days of initial startup, whichever is later.

C.17 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial startup, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Surface Coating

- (a) One (1) chassis preparation operation, identified as CP1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal vehicle chassis, plastic pipes & boxes, using no control equipment, and exhausting indoors;
- (b) One (1) subfloor installation operation, identified as SF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal flooring, using no control equipment, and exhausting indoors;
- (c) One (1) assembly line operation, identified as ALO1, approved for construction in 2008, where surface coating is applied by hand and aerosol cans to plastic and wood parts of recreational vehicles as they are assembled, using no control equipment, and exhausting indoors;
- (d) One (1) undercoat bay, identified as UC1, approved for construction in 2008, where low pressure, non-atomizing flow is used to coat the metal underside of a recreational vehicle chassis, using dry filters to control particulate emissions, and exhausting to stack UC-S1. UC-S1 has a control efficiency of 95% and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of five thousand (5,000) actual cubic feet per minute;
- (e) One (1) touch-up paint operation, identified as TP1, with a maximum capacity of five (5) gallons/day, applied by HVLP and hand, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) Four (4) high volume low pressure (HVLP) spray guns, identified as SG1-SG4, approved for construction in 2008, for application of basecoat and clearcoat surface coatings to plastic, each with a maximum capacity to spray 1.25 gallons/hour.
- (f) One (1) final finish operation, identified as FF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, utilizing hand or aerosol cans to apply non-halogenated organic solvent cleaners and degreasers to plastic, wood, vinyl, and/or glass surfaces, using no control equipment, and exhausting indoors.

(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) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), while performing the surface coating of metal in the operations identified as Assembly Line (ALO1) and Undercoating Bay (UC1), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit discharge into the atmosphere of any volatile organic compound in excess of the following:
  - (1) Four and three-tenths (4.3) pounds of VOC/gallon of coating, excluding water, delivered to a coating applicator for the application of clear coatings.
  - (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water,

delivered to a coating applicator, in a coating application system that is air dried.

- (3) Three (3.0) pounds of VOC/gallon of coating, excluding water, delivered to a coating applicator for the application of any other type of coatings.

If more than one (1) emission limitation listed above applies to a specific coating, then the least stringent emission limitation shall be applied.

#### D.1.2 VOC Clean-up Requirements [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9, 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.

### Compliance Determination Requirements

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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- (a) Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) When non-compliant coatings are used, the daily volume-weighted VOC content shall be calculated using the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

Where:

- A = the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
- C = the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
- U = the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
- n = the number of coatings being averaged

If, for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.1, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.4 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Conditions D.1.1 and D.1.2.

- (1) The VOC content of each coating material and solvent used;
- (2) When using compliant coatings:
  - (A) The cleanup solvent usage for each month; and
  - (B) The total VOC usage for each month.When using non-compliant coatings:
  - (A) The cleanup solvent usage for each day;
  - (B) The total VOC usage for each day; and
  - (C) The volume-weighted average VOC content of the coatings used for each day.
- (3) The amount of coating material and solvent less water used on monthly basis;
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
- (4) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.1, then the Permittee shall not be required to maintain records of the amount of the coatings used in that operation on that day.
- (5) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.1, then the Permittee shall not be required to maintain records of the volume-weighted average VOC content of the coatings used in that operation on that day.
- (6) Records of all required calculations, monitoring data, reports and support information required by this Minor Source Operating Permit (MSOP) 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 in accordance with Section C - General Record Keeping Requirements, of this permit. If the Commissioner makes a request for records to the owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.
- (7) Unless otherwise specified in this Minor Source Operating Permit (MSOP), all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this MSOP.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Woodworking

- (g) One (1) woodworking operation, identified as WW, with a total maximum capacity to cut one thousand three hundred (1300) pounds of wood per hour, using fabric filters to control particulates, and exhausting indoors. This operation consists of the following equipment:
- (1) Five (5) miter saws, identified as MS4-MS8, approved for construction in 2008, each with a maximum capacity to cut fifty (50) pounds of wood per hour, each using an attached dust collector, identified as DC3 - DC7, each rated at 1,300 acfm, respectively, and exhausting indoors.
  - (2) One (1) table saw, identified as TS3, approved for construction in 2008, with a maximum capacity to cut fifty (50) pounds of wood per hour, using attached dust collector, identified as DC8, rated at 1,300 acfm, and exhausting indoors.
  - (3) Two (2) woodworking stations, identified as Stations 1 & 2, approved for construction in 2008, each using separate station-wide dust collection systems and exhausting indoors.  
Consisting of the following equipment:
    - (A) Station 1 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC1, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS1;
      - (ii) One (1) radial arm saw, RA1;
      - (iii) One (1) table saw, TS1;
      - (iv) One (1) pin router, PR1;
      - (v) One (1) belt sander, BTS1;
      - (vi) One (1) miter saw, MS1.
    - (B) Station 2 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC2, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS2,
      - (ii) One (1) radial arm saw, RA2,
      - (iii) One (1) table saw, TS2,
      - (iv) One (1) pin router, PR2,
      - (v) One (1) belt sander, BTS2,
      - (vi) Two (2) miter saws , MS2 & MS3.

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

- (1) Pursuant to 326 IAC 6-3-2(e)(3), the particulate matter (PM) from the woodworking stations, identified as Station 1 & Station 2, shall each not exceed 1.62 pounds

per hour when operating at a process weight rate of 0.25 tons per hour (500 pounds per hour). The pound per hour limitation was calculated using 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:

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

- (2) The woodworking operations, identified as MS4-MS8, all have Process Weight Rates of less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate for each of these operations shall be less than five hundred fifty-one thousandths (0.551) pounds per hour.
- (3) The woodworking operation, TS3, has a Process Weight Rate of less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate for this operation shall be less than five hundred fifty-one thousandths (0.551) pounds per hour.

The following table shows the allowable emission rate for the woodworking operations described in (1) - (3) above:

| Emission Unit/Activity                 | Process Weight Rate (lbs/hr) | Allowable Emissions (326 IAC 6-3-2) (lb/hr) |
|----------------------------------------|------------------------------|---------------------------------------------|
| woodworking operations, Stations 1 & 2 | 500                          | 1.62                                        |
| woodworking operations, MS4-MS8        | 50                           | 0.551                                       |
| woodworking operation, TS3             | 50                           | 0.551                                       |

**D.2.2 Preventative 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 this facility and all control devices.

**Compliance Determination Requirements**

**D.2.3 Particulate Control**

In order to comply with Condition D.2.1:

- (a) the baghouse dust control device DC1 shall be in operation and control emissions from woodworking operations at Station 1, at all times that equipment in Station 1 is in operation,
- (b) the baghouse dust control device DC2 shall be in operation and control emissions from woodworking operations at Station 2, at all times that equipment in Station 2 is in operation,
- (c) the baghouse dust control devices DC3 - DC7 shall be in operation and control emissions from the woodworking operations, identified as MS4-MS8, respectively, at all times that said equipment is in operation,
- (d) the baghouse dust control device DC8 shall be in operation and control emissions from the woodworking operation, identified as TS3, at all times that said equipment is in operation, and

- (e) the Permittee shall operate the control devices DC1 - DC8 in accordance with manufacturer's specifications.
- (f) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.2.4 Broken or Failed Bag Detection**

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

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

#### **D.2.5 Parametric Monitoring**

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- (a) The Permittee shall record the pressure drop across the baghouse, DC1, used in conjunction with woodworking operations identified as Station 1, at least once per week when Station 1 is in operation.
- (b) The Permittee shall record the pressure drop across the baghouse, DC2, used in conjunction with woodworking operations identified as Station 2, at least once per week when Station 2 is in operation.
- (c) When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 4.0 inches of water or a range recommended by the manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that are outside the above mentioned ranges is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (d) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every twelve (12) months.

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

### **D.2.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain:
- (1) Weekly records of the pressure drop across the baghouse, DC1, when Station 1 is in operation. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. Station 1 did not operate that day).
  - (2) Weekly records of the pressure drop across the baghouse, DC2, when Station 2 is in operation. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. Station 2 did not operate that day).

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (h) One (1) gasoline fuel storage and dispensing operation, identified as GT1, approved for construction in 2008, having a storage capacity of 1,000 gallons, and dispensing less than or equal to 100 gallons per day, with uncontrolled emissions.

Under NESHAP 40 CFR 63 Subpart CCCCCC, the one (1) gasoline fuel storage tank GT1 is considered an affected source as part of a new gasoline dispensing facility.

- (i) One (1) diesel fuel storage and dispensing operation, identified as DT1, approved for construction in 2008, having a storage capacity of 500 gallons, and dispensing less than or equal to 500 gallons per day, with uncontrolled emissions.

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

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

##### D.3.1 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-9-1(b), the owner or operator of the volatile organic liquid storage vessels, identified as GT1 & DT1, which are subject to this rule, shall keep all records required by this section for three (3) years unless specified otherwise. Records required by subsection (b) shall be maintained for the life of the vessel.
- (b) Pursuant to 326 IAC 8-9-6(b), the owner or operator of the volatile organic liquid storage vessels, identified as GT1 & DT1, which are subject to this rule, shall maintain a record of the following information for each vessel:
- (1) The vessel identification number,
  - (2) The vessel dimensions,
  - (3) The vessel capacity.

##### D.3.2 Reporting Requirements

The information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after this permit is issued. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (h) One (1) gasoline fuel storage and dispensing operation, identified as GT1, approved for construction in 2008, having a storage capacity of 1,000 gallons, and dispensing less than or equal to 100 gallons per day, with uncontrolled emissions.

Under NESHAP 40 CFR 63 Subpart CCCCCC, the one (1) gasoline fuel storage tank GT1 is considered an affected source as part of a new gasoline dispensing facility.

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

### National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]

#### E.1.1 General Provisions Relating to NESHAP Subpart CCCCCC (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities) [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 3 of 40 CFR Part 63, Subpart CCCCCC in accordance with schedule in 40 CFR 63 Subpart CCCCCC
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

#### E.1.2 NESHAP Subpart CCCCCC Requirements [40 CFR 63.11110, Subpart CCCCCC]

Pursuant to 40 CFR 63, Subpart CCCCCC, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A), beginning on January 10, 2011, as follows:

The existing affected sources associated with the owner or operator of a gasoline dispensing facilities (GDF) that is an area source of hazardous air pollutant (HAP) emissions is subject to the following sections of 40 CFR Part 63, Subpart CCCCCC.

The units subject to this rule include the following:

One (1) gasoline storage tank, identified as GT1  
The pressure/vacuum vents on the gasoline storage tank GT1,  
The equipment necessary to unload product from cargo tanks into the storage tank GT1

Applicable portions of the NESHAP are the following:

- 40 CFR 63. 11110
- 40 CFR 63. 11111(a)(b)(e)(f)
- 40 CFR 63. 11112(a)(d)
- 40 CFR 63. 11113(b)(c)
- 40 CFR 63. 11116
- 40 CFR 63. 11125
- 40 CFR 63. 11130
- 40 CFR 63. 11131
- 40 CFR 63. 11132

Applicable portions of Table 3 of 40 CFR 63, Subpart CCCCCC

E.1.3 One-Time Deadlines Relating to Gasoline Dispensing Facilities Notifications [40 CFR Part 63, Subpart CCCCCC]

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The Permittee shall comply with the following notification requirements by the dates listed:

| <b>Requirement</b>                | <b>Rule Cite</b>                     | <b>Affected Facility</b>    | <b>Deadline</b>  |
|-----------------------------------|--------------------------------------|-----------------------------|------------------|
| Notification of Compliance Status | 40 CFR 63. 11113<br>40 CFR 63. 11124 | Gasoline Storage Tank (GT1) | January 10, 2011 |

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

Source Name: Damon Corporation  
Source Address: 604 Middleton Run Road, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 2888, Elkhart, IN 46515-2888  
MSOP No.: M039-27082-00683

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**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> | Damon Corporation      |
| <b>Address:</b>      | 604 Middleton Run Road |
| <b>City:</b>         | Elkhart, Indiana 46516 |
| <b>Phone #:</b>      | 574-266-9093           |
| <b>MSOP #:</b>       | M039-27082-00683       |

I hereby certify that Damon Corporation is :

still in operation.

no longer in operation.

I hereby certify that Damon Corporation is :

in compliance with the requirements of MSOP M039-27082-00683.

not in compliance with the requirements of MSOP M039-27082-00683.

|                                       |
|---------------------------------------|
| <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> |
|                       |
|                       |
|                       |
|                       |

### 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:

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## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

#### Source Description and Location

|                              |                                                  |
|------------------------------|--------------------------------------------------|
| <b>Source Name:</b>          | <b>Damon Corporation</b>                         |
| <b>Source Location:</b>      | <b>604 Middleton Run Road, Elkhart, IN 46516</b> |
| <b>County:</b>               | <b>Elkhart</b>                                   |
| <b>SIC Code:</b>             | <b>3716</b>                                      |
| <b>Operation Permit No.:</b> | <b>039-27082-00683</b>                           |
| <b>Permit Reviewer:</b>      | <b>Sandra Carr</b>                               |

On October 7, 2008, the Office of Air Quality (OAQ) received an application from Damon Corporation related to the construction and operation of a stationary Class A motor home manufacturing facility.

#### County Attainment Status

The source is located in Elkhart County.

| Pollutant                                                                                                                                                                                                                                                                                                                                                                                                             | Designation                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| SO <sub>2</sub>                                                                                                                                                                                                                                                                                                                                                                                                       | Better than national standards.                                                 |
| CO                                                                                                                                                                                                                                                                                                                                                                                                                    | Unclassifiable or attainment effective November 15, 1990.                       |
| O <sub>3</sub>                                                                                                                                                                                                                                                                                                                                                                                                        | Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup> |
| PM <sub>10</sub>                                                                                                                                                                                                                                                                                                                                                                                                      | Unclassifiable effective November 15, 1990.                                     |
| NO <sub>2</sub>                                                                                                                                                                                                                                                                                                                                                                                                       | Cannot be classified or better than national standards.                         |
| Pb                                                                                                                                                                                                                                                                                                                                                                                                                    | Not designated.                                                                 |
| <sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.<br>Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> . |                                                                                 |

\*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center-North, Tenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204. (*Air Pollution Control Board; 326 IAC 1-4-21; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA*)

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub>

emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants  
Elkhart County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Background and Description of New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Damon Corporation on October 7, 2008, relating to relating to the construction and operation of a new stationary Class A motor home manufacturing facility. All emission units at this source are being considered as new construction subject to New Source Review permitting requirements, since they are all being constructed in a new location.

This application includes information relating to the construction and operation of the following emission units:

- (a) One (1) chassis preparation operation, identified as CP1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal vehicle chassis, plastic pipes & boxes, using no control equipment, and exhausting indoors;
- (b) One (1) subfloor installation operation, identified as SF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, where surface coating is applied by hand and aerosol cans to metal flooring, using no control equipment, and exhausting indoors;
- (c) One (1) assembly line operation, identified as ALO1, approved for construction in 2008, where surface coating is applied by hand and aerosol cans to plastic and wood parts of recreational vehicles as they are assembled, using no control equipment, and exhausting indoors;
- (d) One (1) undercoat bay, identified as UC1, approved for construction in 2008, where low pressure, non-atomizing flow is used to coat the metal underside of a recreational vehicle chassis, using dry filters to control particulate emissions, and exhausting to stack UC-S1. UC-S1 has a control efficiency of 95% and a maximum design grain loading of less than or equal to 0.002 grain per actual cubic foot of outlet air, when operated at a maximum gas flow rate of five thousand (5,000) actual cubic feet per minute;
- (e) One (1) touch-up paint operation, identified as TP1, with a maximum capacity of five (5) gallons/day, applied by HVLP and hand, using no control equipment, and exhausting indoors. This operation consists of the following equipment:

- (1) Four (4) high volume low pressure (HVLP) spray guns, identified as SG1-SG4, approved for construction in 2008, for application of basecoat and clearcoat surface coatings to plastic, each with a maximum capacity to spray 1.25 gallons/hour.
- (f) One (1) final finish operation, identified as FF1, approved for construction in 2008, with a maximum capacity of five (5) gallons/day, utilizing hand or aerosol cans to apply non-halogenated organic solvent cleaners and degreasers to plastic, wood, vinyl, and/or glass surfaces, using no control equipment, and exhausting indoors.
- (g) One (1) woodworking operation, identified as WW, with a total maximum capacity to cut one thousand three hundred (1300) pounds of wood per hour, using fabric filters to control particulates, and exhausting indoors. This operation consists of the following equipment:
  - (1) Five (5) miter saws, identified as MS4-MS8, approved for construction in 2008, each with a maximum capacity to cut fifty (50) pounds of wood per hour, each using an attached dust collector, identified as DC3 - DC7, each rated at 1,300 acfm, respectively, and exhausting indoors.
  - (2) One (1) table saw, identified as TS3, approved for construction in 2008, with a maximum capacity to cut fifty (50) pounds of wood per hour, using attached dust collector, identified as DC8, rated at 1,300 acfm, and exhausting indoors.
  - (3) Two (2) woodworking stations, identified as Stations 1 & 2, approved for construction in 2008, each using separate station-wide dust collection systems and exhausting indoors. Consisting of the following equipment:
    - (A) Station 1 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC1, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS1;
      - (ii) One (1) radial arm saw, RA1;
      - (iii) One (1) table saw, TS1;
      - (iv) One (1) pin router, PR1;
      - (v) One (1) belt sander, BTS1;
      - (vi) One (1) miter saw, MS1.
    - (B) Station 2 consists of the following equipment, each with a maximum capacity to cut five hundred (500) pounds of wood per hour. This equipment shares a dry fabric filter dust control system, identified as DC2, constructed in 2004, and rated at 5,900 acfm.
      - (i) One (1) vertical saw, VS2,
      - (ii) One (1) radial arm saw, RA2,
      - (iii) One (1) table saw, TS2,
      - (iv) One (1) pin router, PR2,
      - (v) One (1) belt sander, BTS2,
      - (vi) Two (2) miter saws , MS2 & MS3.

- (h) One (1) gasoline fuel storage and dispensing operation, identified as GT1, approved for construction in 2008, having a storage capacity of 1,000 gallons, and dispensing less than or equal to 100 gallons per day, with uncontrolled emissions.  
  
Under NESHAP 40 CFR 63 Subpart CCCCCC, the one (1) gasoline fuel storage tank GT1 is considered an affected source as part of a new gasoline dispensing facility.
- (i) One (1) diesel fuel storage and dispensing operation, identified as DT1, approved for construction in 2008, having a storage capacity of 500 gallons, and dispensing less than or equal to 500 gallons per day, with uncontrolled emissions.
- (j) One (1) welding and thermal cutting operation, identified as WC1, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) One (1) metal inert gas (MIG) welding station, approved for construction in 2008, using E70S-3 wire, with a maximum consumption of 0.85 pounds of wire per hour;
  - (2) One (1) plasma cutting station, approved for construction in 2008, where the maximum metal thickness cut is 0.37 inches and the maximum metal cutting rate is 12 inches/minute;
  - (3) One (1) oxyacetylene cutting station, approved for construction in 2008, where the maximum metal thickness cut is 0.75 inches and the maximum metal cutting rate is 12 inches/minute.
- (k) One (1) miscellaneous cutting operation, identified as MPE1, using no control equipment, and exhausting indoors. This operation consists of the following equipment:
  - (1) One (1) abrasive chop saw, identified as MPE1, approved for construction in 2008, with a maximum capacity to cut 50 pounds of steel pipe per hour.
  - (2) Two (2) aluminum chop/miter saws, identified as MPE2 & MPE3, approved for construction in 2008, with a maximum capacity to cut 25 pounds of aluminum trim per hour.
  - (3) Three (3) band saws, identified as MPE4 - MPE6, approved for construction in 2008, with a maximum capacity to cut 10 pounds of wood per hour.
  - (4) Two (2) miter saws, identified as MPE7 & MPE8, approved for construction in 2008, with a maximum capacity to cut 15 pounds of plastic pipe per hour.
- (l) Space heaters, process heaters, or make-up air units using the following fuels:
  - (1) Natural gas-fired combustion sources with the combined heat input of 4.80 million British thermal units per hour (MMBtu/hr).
- (m) Paved roads and parking lots with public access.

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|---------------------------|
| <b>Enforcement Issues</b> |
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There are no pending enforcement actions related to this source.

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|------------------------------|
| <b>Emission Calculations</b> |
|------------------------------|

The calculations submitted by the applicant have been verified by IDEM and found to be accurate and correct. These calculations are provided in Appendix A of this document.

**Permit Level Determination – MSOP**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls, excluding the emission limits that were contained in their previous FESOP. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant                           | Potential To Emit (tons/year) |
|-------------------------------------|-------------------------------|
| PM <sup>(3)</sup>                   | 3.37                          |
| PM <sub>10</sub> <sup>(1)(3)</sup>  | 3.34                          |
| PM <sub>2.5</sub> <sup>(2)(3)</sup> | 3.34                          |
| SO <sub>2</sub>                     | 0.01                          |
| NO <sub>x</sub>                     | 2.10                          |
| VOC                                 | 40.36                         |
| CO                                  | 1.77                          |

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant".
- (2) PM<sub>2.5</sub> is considered equivalent to PM<sub>10</sub>.
- (3) In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (ALJ) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

| HAPs                | Potential To Emit (tons/year) |
|---------------------|-------------------------------|
| Ethyl benzene       | 0.22                          |
| Hexane              | 0.23                          |
| Methyl diisocyanate | 0.27                          |
| Methanol            | 0.49                          |
| Toluene             | 4.20                          |
| Xylene              | 1.64                          |
| <b>TOTAL HAPs</b>   | <b>7.11</b>                   |

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

- (a) 40 CFR Part 60.110, Subpart K - Standards of Performance for Volatile Organic Liquid Storage Vessels  
Provisions of the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.110, Subpart K) "Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978" applies to storage vessels with storage capacity greater than 40,000 gallons. This subpart does not apply to this source because the storage vessels, identified as GT1 & DT1, were approved for construction after 1978, and have storage capacities of less than 40,000 gallons.
- (b) 40 CFR Part 60.110, Subpart Ka - Standards of Performance for Volatile Organic Liquid Storage Vessels  
Provisions of the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.110, Subpart Ka) "Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and prior to July 23, 1984" applies to storage vessels with storage capacity greater than 40,000 gallons. This subpart does not apply because the storage vessels, identified as GT1 & DT1, were approved for construction after 1984, and have storage capacities of less than 40,000 gallons.
- (c) 40 CFR Part 60.110, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels  
Provisions of the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.110, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after July 23, 1984" apply to storage vessels with storage capacity greater than or equal to 19,813 gallons. This subpart does not apply because the storage vessels, identified as GT1 & DT1, have storage capacities of less than 19,813 gallons.
- (d) 40 CFR Part 60.500, Subpart XX - Standards of Performance for Bulk Gasoline Terminals  
The source is not subject to the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because this source does not receive gasoline by pipeline, ship, or barge, and it has a gasoline throughput of less than 19,998 gallons per day. This source is not a bulk gasoline terminal as defined in 60.501; therefore, this rule does not apply.
- (e) There are no other New Source Performance Standards (NSPS) (40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) 40 CFR Part 63.420, Subpart R - Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)  
Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R) "Standards for Gasoline Distribution Facilities" apply to storage tanks and loading racks at a bulk gasoline terminals. Because this source has a gasoline throughput of less than 19,998 gallons per day, and, therefore, does not meet the definition of a bulk gasoline terminal, this rule does not apply.
- (g) 40 CFR Part 63.800, Subpart JJ - Wood Furniture Manufacturing Operations  
The source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.800, Subpart JJ) for "Wood Furniture Manufacturing

Operations" because the affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source of HAP as defined in 40 CFR part 63, subpart A, §63.2. Damon Corporation is not subject to this rule because it is not a major source of HAP as defined in 40 CFR 63.2..

- (h) 40 CFR Part 63.2330, Subpart EEEE - Organic Liquids Distribution (Non-gasoline)  
Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.2330, Subpart EEEE) "Organic Liquids Distribution (Non-gasoline)" apply to organic hazardous air pollutants (HAP) emitted from organic liquids distribution (non-gasoline) operations at major sources of HAP emissions. Damon Corporation is not subject to this rule because it is not a major source of HAP as defined in 40 CFR 63.2.
- (i) 40 CFR Part 63.3880, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products  
The National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981) applies to major sources at hazardous air pollutants (HAP), Damon Corporation is not subject to this rule because it is not a major source of HAP as defined in 40 CFR 63.2..
- (j) 40 CFR Part 63.4480, Subpart PPPP - Surface Coating of Plastic Parts and Products  
This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480 - 63.4581), because the source is not a major source of hazardous air pollutants (HAP) as defined in 40 CFR 63.2.
- (k) 40 CFR Part 63.11110, Subpart CCCCCC - Gasoline Dispensing Facilities (GDF)  
The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category, 40 CFR 63, Subpart CCCCCC - (Gasoline Dispensing Facilities (GDF)) apply to owners or operators of gasoline dispensing facilities (GDF). This subpart establishes emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at GDF. The subpart also establishes requirements to demonstrate compliance with emission limitations and management practices. [See Attachment A for a complete copy of 40 CFR Part 63.11110, Subpart CCCCCC.]

The affected source to which this subpart applies is each gasoline dispensing facility (GDF) that is located at an area source of hazardous air pollutants (HAP). The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

At Damon Corporation, the new affected emission sources to which this subpart applies are the gasoline storage tank, identified as GT1, the pressure/vacuum vents on the gasoline storage tank GT1, and the equipment necessary to unload product from cargo tanks into the storage tank GT1 at this GDF. (The equipment used for the refueling of motor vehicles is not covered by this subpart.)

Therefore, the provisions of 40 CFR Part 63, subpart CCCCCC are applicable to this source and will be included in this permit.

The units subject to this rule include the following:

One (1) gasoline storage tank, identified as GT1

Applicable portions of the NESHAP are the following:

- 40 CFR 63. 11110
- 40 CFR 63. 11111(a)(b)(e)(f)
- 40 CFR 63. 11112(a)(d)
- 40 CFR 63. 11113(b)(c)
- 40 CFR 63. 11116
- 40 CFR 63. 11125
- 40 CFR 63. 11130
- 40 CFR 63. 11131
- 40 CFR 63. 11132
- Table 3

Nonapplicable portions of the NESHAP will not be included in the permit.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the gasoline storage tank GT1, the pressure/vacuum vents on the gasoline storage tank GT1, and the equipment necessary to unload product from cargo tanks into the storage tank GT1 at this GDF except as otherwise specified in 40 CFR Part 63, Subpart CCCCC.

- (l) 40 CFR Part 63.2330, Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources  
This source is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because, although this source meets the definition of an area source, as defined in 40 CFR § 63.2, no methylene chloride is used for paint stripping operations, the surface coating operations performed at this source do not include refinishing of mobile vehicles or equipment as described in § 63.11169(b) and the coatings used at this source do not contain the target HAP; chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), as defined in § 63.11180.
- (m) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (n) Pursuant to 40 CFR Part 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

|                                                 |
|-------------------------------------------------|
| <b>State Rule Applicability - Entire Source</b> |
|-------------------------------------------------|

The following state rules are evaluated for applicability to the entire source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an

area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to part (a) of this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. However, pursuant to 326 IAC 2-6-1(b), all sources permitted by the department are subject to 326 IAC 2-6-5 of this rule which states that the department may request emissions and emission-related information about any regulated air pollutant as defined at 326 IAC 2-7-1(31) from any permitted source when needed for air quality planning, air quality modeling, or state implementation plan development.
- (e) 326 IAC 2-7-5(13) (Preventive Maintenance Plan)  
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.
- (f) 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:
- (1) 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.
  - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
This rule applies to facilities, constructed after January 1, 1980, located anywhere in the state, having potential VOC emissions of twenty-five (25) tons or more per year, which are not regulated by any other provision of Article 8.

The requirements of 326 IAC 8-1-6 are not applicable to any of the operations at this source, since no operation has the potential to emit greater than twenty-five tons of VOC per year and because this source is subject to 326 IAC 8-2-9.

|                                               |
|-----------------------------------------------|
| <b>State Rule Applicability - Woodworking</b> |
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The following state rules are evaluated for applicability to the woodworking (WW) operations at this source:

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2(e)(3), the particulate matter (PM) from the woodworking stations, identified as Station 1 & Station 2, shall each not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour (500 pounds per hour). The pound per hour limitation was calculated using the following equation:

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

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

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

In order to comply with the allowable rate of emission, the dust collector, DC1, shall be in operation at all times Station 1 is operating and dust collector, DC2, shall be in operation at all times Station 2 is operating and the Permittee shall operate these control devices in accordance with manufacturer's specifications.

- (2) The woodworking operations, identified as MS4-MS8, all have Process Weight Rates of less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate for each of these operations shall be less than five hundred fifty-one thousandths (0.551) pounds per hour.

In order to comply with the allowable rate of emission, the dust control devices, DC3-DC7, shall operate at all times the woodworking operations, identified as MS4-MS8, are operating and the Permittee shall operate these control devices in accordance with manufacturer's specifications.

- (3) The woodworking operation, TS3, has a Process Weight Rate of less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate for this operation shall be less than five hundred fifty-one thousandths (0.551) pounds per hour.

In order to comply with the allowable rate of emission, the dust control device, DC8, shall operate at all times the woodworking operation, identified as TS3, is operating and the Permittee shall operate the control device in accordance with manufacturer's specifications.

The following table shows the allowable emission rate for the woodworking operations described in (1) - (3) above:

| Emission Unit/Activity                 | Process Weight Rate (lbs/hr) | Allowable Emissions (326 IAC 6-3-2) (lb/hr) |
|----------------------------------------|------------------------------|---------------------------------------------|
| woodworking operations, Stations 1 & 2 | 500                          | 1.62                                        |
| woodworking operations, MS4-MS8        | 50                           | 0.551                                       |
| woodworking operations, TS3            | 50                           | 0.551                                       |

- (4) The miscellaneous particulate emissions from the cutting operations, identified as MPE1-MPE8, are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**State Rule Applicability - Surface Coating**

The following state rules are evaluated for applicability to the surface coating operations at this source:

- (k) 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)  
 (1) The surface coating operations, identified as Subfloor Installation (SF1) and Touch-Up Painting (TP1) each use less than five (5) gallons of coatings per day. Therefore,

pursuant to 326 IAC 6-3-1(b)(15), these surface coating operations are exempt from 326 IAC 6-3.

- (2) Pursuant to 326 IAC 6-3-1(b)(7), the operation, identified as Undercoating (UC1), is exempt from the requirements of 326 IAC 6-3 because the surface coating application method is low pressure, non-atomizing flow coating. However, this source has chosen to install dry particulate filters and will operate this control device in accordance with the manufacturer's specifications.
  - (3) Pursuant to 326 IAC 6-3-1(b)(14), the surface coating operations, identified as Chassis Prep (CP1), Assembly Line (ALO1), and Final Finish (FF1) are exempt from the requirements of 326 IAC 6-3, because they have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour. (See Appendix A for calculations.)
- (l) 326 IAC 8-2 Surface Coating Emission Limitations  
Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to surface coating operations, constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Also pursuant to 326 IAC 8-2-9(a)(5), provisions of 326 IAC 8-2-9 (Miscellaneous metal coating operations) apply to surface coating of metal parts or products categorized under the Standard Industrial Classification Code (SIC) of the major groups #33, #34, #35, #36, #37, #38, and #39.

- 1) The surface coating operations identified as Chassis Prep (CP1), Sub-Floor Installation (SF1), and Touch-up Paint (TP1), each have actual VOC emissions less than fifteen (15) pounds per day before add-on controls. Therefore, these operations, CP1, SF1, & TP1, are not subject to the requirements of 326 IAC 8-2.
- (2) The Assembly Line (ALO1) and Undercoating Bay (UC1) operations are subject to IAC 8-2-9 because the actual VOC emissions are greater than fifteen (15) pounds per day. Therefore, pursuant to 326 IAC 8-2-9(d) (Miscellaneous Metal Coating Operations), while performing the surface coating of metal in the operations identified as Assembly Line (ALO1) and Undercoating Bay (UC1), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit discharge into the atmosphere of any volatile organic compound in excess of the following:
  - (A) Four and three-tenths (4.3) pounds of VOC/gallon of coating, excluding water, delivered to a coating applicator for the application of clear coatings.
  - (B) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
  - (C) Three (3.0) pounds of VOC/gallon of coating, excluding water, delivered to a coating applicator for the application of any other type of coatings.
- (3) Pursuant to 326 IAC 8-2-9(e), if more than one (1) emission limitation listed above applies to a specific coating, then the least stringent emission limitation shall be applied.
- (4) Surface coating operations which are subject to 326 IAC 8-2-9(d) are also subject to 326 IAC 8-2-9(f) which states that 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.

- (5) Pursuant to 326 IAC 8-1-2(a)(7), the source shall comply using either compliant coatings or, when non-compliant coatings are used, a daily volume-weighted average.
- (A) The surface coating operations performed in the assembly line operations (ALO1) shall use compliant coatings.
  - (B) The source shall record the manufacturer's product number and the amount of each coating used each day.
  - (C) When non-compliant coatings are used, the daily volume-weighted VOC content shall be calculated using the following equation:

Where:

$$A = \left( \sum C \times U \right) / \left( \sum U \right)$$

A = Volume weighted average (pounds VOC/gallon, less water as applied);  
 C = VOC content of the coating (pounds VOC/gallon, less water as applied); and  
 U = Usage rate of the coating (gallons/day).

The table below summarizes metal surface coating in the Assembly Line (ALO1) and Undercoating Bay (UC1) operations. Based on the maximum usage information provided by the source, the volume-weighted VOC content of each of the coatings is less than the limit specified for the coating type. Therefore, compliance with 326 IAC 8-2-9 is expected.

| Coating                     | Substrate      | Volume % Water & Exempt | Maximum Usage (gal / 24 hr) | Maximum Usage (lb/hr) | VOC Content (Pounds VOC per gallon of coating less water) | ( $\sum C \times U$ ) | ( $\sum U$ ) | Volume Weighted VOC Content of Coatings for listed operations (lb/gal) less water and exempt VOC | 326 IAC 8-2 Emission Limit |
|-----------------------------|----------------|-------------------------|-----------------------------|-----------------------|-----------------------------------------------------------|-----------------------|--------------|--------------------------------------------------------------------------------------------------|----------------------------|
| <b>Assembly Line (ALO1)</b> |                |                         |                             |                       |                                                           |                       |              |                                                                                                  |                            |
| Brake and Parts Cleaner     | Metal, Plastic | 19.55%                  | 0.79                        | 0.21                  | 6.42                                                      | 5.09                  | 13.76        | 2.34                                                                                             | 3.50                       |
| Sealant - Colors            | Metal/Plastic  | 0.00%                   | 0.38                        | 0.21                  | 0.27                                                      | 0.10                  |              |                                                                                                  |                            |
| Sealant - Clear             | Metal/Plastic  | 0.00%                   | 5.52                        | 1.78                  | 2.92                                                      | 16.12                 |              |                                                                                                  |                            |
| Sealant - White             | Metal/Plastic  | 0.00%                   | 3.43                        | 1.20                  | 2.75                                                      | 9.45                  |              |                                                                                                  |                            |
| Sika Flex 221               | Glass/Metal    | 0.00%                   | 1.10                        | 0.48                  | 0.43                                                      | 0.47                  |              |                                                                                                  |                            |
| Sika Flex 521               | Glass/Metal    | 0.00%                   | 0.78                        | 0.38                  | 0.01                                                      | 0.01                  |              |                                                                                                  |                            |
| Sika Flex 255-FC            | Glass/Metal    | 0.00%                   | 0.94                        | 0.39                  | 0.53                                                      | 0.50                  |              |                                                                                                  |                            |
| Sika Flex 252               | Glass/Metal    | 0.00%                   | 0.82                        | 0.34                  | 0.55                                                      | 0.45                  |              |                                                                                                  |                            |
| <b>Undercoating (UC1)</b>   |                |                         |                             |                       |                                                           |                       |              |                                                                                                  |                            |
| Z Shield                    | Metal          | 52.11%                  | 24.00                       | 0.71                  | 1.48                                                      | 35.61                 | 24.00        | 1.48                                                                                             | 4.30                       |

(m) 326 IAC 8-2-11 (Volatile Organic Compounds, Fabric and Vinyl Coating)  
Pursuant to 326 IAC 8-2-11, "Fabric coating" means the coating or saturation of a textile substrate with a knife, roll, or rotogravure coater to impart properties that are not initially present, such as strength, stability, water repellancy, or appearance. "Vinyl coating" means applying a functional, decorative or protective topcoat or printing on vinyl coated fabric or vinyl sheets. The requirements of 326 IAC 8-2-11 are not applicable to this source, since this source does not perform surface coating of fabric or vinyl as defined by 326 IAC 8-2-11(a).

(n) 326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)  
The requirements of 326 IAC 8-2-12 are applicable to sources which perform surface coating of wood furniture or cabinets. All furniture and cabinets used in the production of these Class A motor homes are received pre-coated, however, installation of these pre-coated items during the assembly line operations (ALO1) requires application of adhesives and sealants to secure the cabinets or furniture to the structural framing of the motor home. In addition, touch-up painting (TP1) maybe required after installation is completed and final finishing operations (FF1) are performed on all completed motor homes.

Pursuant to 326 IAC 8-2-12, an owner or operator of a wood furniture or cabinet coating operation subject to this section shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

For this permit, Acceptable Alternative Application Systems shall also include:

- (1) High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (2) Application using Heat Set Adhesive Strips is an accepted alternative to roller coating. Heat Set Strips is technology used to apply coating (adhesive) to substrate by having the coating already applied to a web. The web is placed between the two substrates and heat is applied. Application of heat causes the coating to bond with the substrate.
- (3) Application using a manually powered or airless caulking gun is an accepted alternative to hand/wipe application. This technology is used to apply coating (adhesive and/or sealant) to a substrate while minimizing the emission of particulates or volatile organic compounds.

According to information provided by Damon Corporation, this source is in compliance with 326 IAC 8-2-12 since heat set adhesive coated webbing, air-assisted airless caulking, and HVLP are being utilized to apply coatings to wood furniture and/or wood components in the assembly line (ALO1), touch-up paint (TP1), and final finish (FF1) operations.

(o) 326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)  
The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source does not perform manufacturing of wood furniture.

### **State Rule Applicability - Welding/Thermal Cutting**

The following state rules are evaluated for applicability to the welding and thermal cutting operations at this source:

- (p) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-1(a)(9), the metal welding operations, identified as WC1, consisting of one (1) metal inert gas (MIG) welding station, are not subject to 326 IAC 6-3-2 as these stations use less than six hundred twenty-five (625) pounds of rod or wire per day.
  - (2) Pursuant to 326 IAC 6-3-1(a)(10), the thermal cutting operations, identified as WC1, consisting of one (1) plasma cutter station and one (1) oxy-acetylene/electric arc flame cutter station, are not subject to 326 IAC 6-3-2 as these stations cut less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thick.

### **State Rule Applicability – Natural Gas Combustion Sources**

The following state rules are evaluated for applicability to the Natural gas combustion operations at this source:

- (q) 326 IAC 4-2-2 (Incinerators)  
The natural gas-fired heaters, furnaces, and air makeup unit are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, these ovens are not subject to 326 IAC 4-2-2.
- (r) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
The natural gas-fired heaters, furnaces, and air makeup unit are not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (s) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Emissions from the natural gas-fired combustion units, identified as two (2) office heaters, six (6) makeup air units, seven (7) radiant heaters, two (2) infrared heaters, and two (2) forced air furnaces, are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (t) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)  
The natural gas-fired office heaters, radiant heaters, infrared heaters, furnaces, and makeup air units are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual SO<sub>2</sub> emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

### **State Rule Applicability - Petroleum Storage & Distribution**

The following state rules are evaluated for applicability to the petroleum distribution operations at this source:

- (u) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)
  - (1) Pursuant to 326 IAC 8-4-1(f), the Gasoline Storage Tank, GT1, is not subject to this rule because, although it is located in Elkhart County, it has a throughput of less than ten thousand (10,000) gallons of gasoline per month.
  - (2) Pursuant to 326 IAC 8-4-6(a)(8), the Diesel Storage Tank, DT1, is not subject to this rule because diesel & kerosene are not considered to be motor vehicle fuels.

- (v) 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)  
Pursuant to 326 IAC 8-9-1(b), stationary vessels with capacities less than thirty-nine thousand (39,000) gallons are only subject to the reporting and record keeping requirements of 326 IAC 8-9-1. The volatile organic liquid storage vessels, identified as Gasoline Tank 1 (GT1) and Diesel Tank 1 (DT1), each have storage capacities less than one thousand (1000) gallons and are therefore subject to provisions 326 IAC 8-9-6(a) & (b).
- (1) Pursuant to 326 IAC 8-9-6(a), the owner or operator of the volatile organic liquid storage vessels, identified as GT1 & DT1, which are subject to this rule, shall keep all records required by this section for three (3) years unless specified otherwise. Records required by subsection (b) shall be maintained for the life of the vessel.
- (2) Pursuant to 326 IAC 8-9-6(b), the owner or operator of the volatile organic liquid storage vessels, identified as GT1 & DT1, which are subject to this rule, shall maintain a record and submit to the department a report containing the following information for each vessel:
- (A) The vessel identification number,  
(B) The vessel dimensions,  
(C) The vessel capacity.

There are no other 326 IAC 8 Rules that are applicable to the operations performed at this source.

- (w) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (x) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

|                             |
|-----------------------------|
| <b>Testing Requirements</b> |
|-----------------------------|

- (a) Compliance testing is not required for the surface coating operations in the Chassis Prep (CP1), Sub-floor Installation (SF1), Assembly Line operations (ALO1), Undercoating Bay (UC1), Touch-up Paint (TP1), and Final Finish (FF1) operations, since compliance with the VOC content requirements for the coatings can be determined by evaluating MSDS (or "as supplied" and "as applied" VOC data sheets) and keeping records of the amount of coatings, any applicable calculations, and VOC applied.
- (b) Compliance testing is not required for the woodworking operation (WW), since
- (1) the baghouse dust control device DC1 shall be in operation and control emissions from woodworking operations at Station 1, at all times that equipment in Station 1 is in operation,
- (2) the baghouse dust control device DC2 shall be in operation and control emissions from woodworking operations at Station 2, at all times that equipment in Station 2 is in operation,
- (3) the baghouse dust control devices DC3 - DC7 shall be in operation and control emissions from the woodworking operations, identified as MS4-MS8, respectively, at all times that said equipment is in operation,
- (4) the baghouse dust control device DC8 shall be in operation and control emissions from the woodworking operation, identified as TS3, at all times that said equipment is in operation, and

- (5) the Permittee shall operate the control devices DC1 - DC8 in accordance with manufacturer's specifications,

in order to comply with 326 IAC 6-3-2, and the monitoring requirements are sufficient to determine compliance.

|                                |
|--------------------------------|
| <b>Monitoring Requirements</b> |
|--------------------------------|

- (a) The monitoring requirements applicable to this source are shown in the table below:

| <b>Emission Unit/Control</b> | <b>Operating Parameters</b> | <b>Frequency</b>    |
|------------------------------|-----------------------------|---------------------|
| Baghouses (DC1, DC2)         | Pressure Drop               | Once per week, each |
| Baghouses (DC1 - DC8)        | Filter check                | Once per day, each  |

The woodworking operations (WW) have applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters on the particulate control devices used in the woodworking operations (WW), identified as DC1 - DC8, while one or more pieces of the equipment is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (2) **Visible Emissions**  
Daily visible emission notations of the exhaust from the particulate control devices DC1 - DC8 controlling the emissions from the woodworking operations (WW), shall be performed once per day during normal daylight operations when exhausting to the atmosphere.. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this operation shall contain troubleshooting, contingency, and corrective actions for when an abnormal emission is observed.
- (3) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
- (A) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (B) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (C) Within eight (8) business hours of the determination of failure, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances. For any failure with corresponding response steps and timetable not described in the Response to Excursions or Exceedances, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (D) For single compartment baghouses, if failure is indicated by a significant drop in the baghouses' pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouse, DC1, used in conjunction with woodworking operations, identified as Station 1, at least once per day when Station 1 is in operation.
- (b) The Permittee shall record the pressure drop across the baghouse, DC2, used in conjunction with woodworking operations, identified as Station 2, at least once per day when Station 2 is in operation.
- (c) When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 4.0 inches of water or a range recommended by the manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that are outside the above mentioned range is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (d) The Permittee shall include in its daily record when a pressure drop notation is not taken and the reason for the lack of a pressure drop notation (e.g., the plant did not operate that

day).

- (e) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every twelve (12) months.

These monitoring conditions are necessary because the baghouse dust controllers (DC1 - DC8) for the woodworking operations (WW) must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

### **Air Quality Impacts from Minor Sources**

#### **Modeling Overview**

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants from this proposed source to estimate whether the Limited PTE criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

#### **Modeling Results**

The modeling results indicate that the Limited PTE criteria pollutants from this source will not exceed the National Ambient Air Quality Standards (NAAQS).

### **Conclusion and Recommendation**

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 7 and November 5, 2008.

The construction and operation of this stationary Class A motor home manufacturing facility shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit No. 039-27082-00683. The staff recommends to the Commissioner that this MSOP be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5372) or toll free at 1-800-451-6027 extension (45372).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Emissions Calculations  
Summary Emissions**

Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009

**POTENTIAL TO EMIT IN TONS PER YEAR**

| Emission Units                                     | PM          | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NOx         | VOC          | CO          | * Highest Single HAP | Combined HAP |
|----------------------------------------------------|-------------|------------------|-------------------|-----------------|-------------|--------------|-------------|----------------------|--------------|
| Chasis Preparation (CP1)                           | 0.05        | 0.05             | 0.05              | 0.00            | 0.00        | 1.14         | 0.00        | 0.23                 | 1.25         |
| Subfloor Installation (SF1)                        | 0.21        | 0.21             | 0.21              | 0.00            | 0.00        | 1.74         | 0.00        | 0.00                 | 0.23         |
| Assembly Line Operations (ALO1)                    | 0.00        | 0.00             | 0.00              | 0.00            | 0.00        | 21.74        | 0.00        | 0.48                 | 0.90         |
| Undercoat Bay (UC1)                                | 0.00        | 0.00             | 0.00              | 0.00            | 0.00        | 3.11         | 0.00        | 0.00                 | 0.00         |
| Touchup Paint Operation (TP1)                      | 0.24        | 0.24             | 0.24              | 0.00            | 0.00        | 1.57         | 0.00        | 0.00                 | 0.44         |
| Final Finish (FF1)                                 | 0.11        | 0.11             | 0.11              | 0.00            | 0.00        | 10.64        | 0.00        | 3.49                 | 4.28         |
| Welding/Cutting/Brazing (WC1)                      | 0.02        | 0.02             | 0.02              | 0.00            | 0.00        | 0.00         | 0.00        | 0.00                 | 0.00         |
| Woodworking (WW1)                                  | 0.74        | 0.74             | 0.74              | 0.00            | 0.00        | 0.00         | 0.00        | 0.00                 | 0.00         |
| Miscellaneous Fugitive PM Equipment (MPE1)         | 1.96        | 1.96             | 1.96              | 0.00            | 0.00        | 0.00         | 0.00        | 0.00                 | 0.00         |
| Diesel Storage Tank (DT1) - See Tanks 4.0 Report   | 0.00        | 0.00             | 0.00              | 0.00            | 0.00        | 0.0002       | 0.00        | 0.00001              | 0.00002      |
| Gasoline Storage Tank (GT1) - See Tanks 4.0 Report | 0.00        | 0.00             | 0.00              | 0.00            | 0.00        | 0.30         | 0.00        | 0.001                | 0.003        |
| Natural Gas Combustion (NGC1)                      | 0.04        | 0.01             | 0.01              | 0.01            | 2.06        | 0.11         | 1.73        | 0.00                 | 0.002        |
| <b>TOTALS</b>                                      | <b>3.37</b> | <b>3.34</b>      | <b>3.34</b>       | <b>0.01</b>     | <b>2.06</b> | <b>40.36</b> | <b>1.73</b> | <b>4.20</b>          | <b>7.11</b>  |

**\*Toluene as Determined Below**

| Emission Units                                     | Benzene Emissions (ton/yr) | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Manganese Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|----------------------------------------------------|----------------------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|------------------------------|
| Chasis Preparation (CP1)                           | 0.00                       | 0.18                             | 0.00                            | 0.00                      | 0.21                   | 0.00                        | 0.00                    | 0.23                       | 0.61                      | 0.00                         | 1.25                         |
| Subfloor Installation (SF1)                        | 0.00                       | 0.00                             | 0.00                            | 0.23                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         | 0.23                         |
| Assembly Line Operations (ALO1)                    | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.05                   | 0.00                        | 0.00                    | 0.48                       | 0.37                      | 0.00                         | 0.90                         |
| Undercoat Bay (UC1)                                | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         | 0.00                         |
| Touchup Paint Operation (TP1)                      | 0.00                       | 0.03                             | 0.01                            | 0.00                      | 0.00                   | 0.00                        | 0.04                    | 0.00                       | 0.36                      | 0.00                         | 0.44                         |
| Final Finish (FF1)                                 | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.49                        | 0.00                    | 3.49                       | 0.29                      | 0.00                         | 4.28                         |
| Welding/Cutting/Brazing (WC1)                      | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.001                        | 0.001                        |
| Woodworking (WW1)                                  | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         | 0.00                         |
| Miscellaneous Fugitive PM Equipment (MPE1)         | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         | 0.00                         |
| Diesel Storage Tank (DT1) - See Tanks 4.0 Report   | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00001                    | 0.00001                   | 0.00                         | 0.00002                      |
| Gasoline Storage Tank (GT1) - See Tanks 4.0 Report | 0.001                      | 0.0001                           | 0.00                            | 0.001                     | 0.00                   | 0.00                        | 0.00                    | 0.001                      | 0.0004                    | 0.00                         | 0.003                        |
| Natural Gas Combustion (NGC1)                      | 0.00                       | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         | 1.79E-03                     |
| <b>Total Emissions (TPY) by HAP</b>                | <b>0.001</b>               | <b>0.22</b>                      | <b>0.01</b>                     | <b>0.23</b>               | <b>0.27</b>            | <b>0.49</b>                 | <b>0.04</b>             | <b>4.20</b>                | <b>1.64</b>               | <b>0.00</b>                  | <b>7.11</b>                  |

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Chassis Preparation (CP1)**

Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009

| Process      | Manufacturer     | Product Number | Use     | Description           | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb/hr) | PTE VOC (lb/24 hr day) | PTE VOC (ton/yr) | PTE PM/PM <sub>10</sub> (ton/yr) | lb VOC /gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate     |
|--------------|------------------|----------------|---------|-----------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|------------------------|---------------------|-----------------------------------------------------------|----------------------------------|-----------------|------------------------|------------------|----------------------------------|--------------------|---------------------------------------|--------------------|---------------|
| Chassis Prep | Sherwin Williams | S04114         | Coating | Gloss Black Paint     | 6.08             | 91.59%                             | 40.00%                  | 51.59%            | 36.79%                  | 6.00%                           | 0.0420                 | 1.000               | 4.96                                                      | 3.14                             | 0.13            | 3.16                   | 0.58             | 0.05                             | 52.28              | 50%                                   | Aerosol            | Metal/Plastic |
| Chassis Prep | Geocol Corp.     | 3300 Colors    | Sealant | Sealant               | 11.22            | 3.90%                              | 0.00%                   | 3.90%             | 0.00%                   | 94.17%                          | 0.2500                 | 1.000               | 0.44                                                      | 0.44                             | 0.11            | 2.63                   | 0.48             | 0.00                             | 0.46               | 100%                                  | Caulk Gun          | Metal         |
| Chassis Prep | Dow Chemical     | ENER45 SF      | Foam    | Expanding Foam        | 10.84            | 30.00%                             | 30.00%                  | 0.00%             | 41.06%                  | 45.80%                          | 0.0125                 | 1.000               | 0.00                                                      | 0.00                             | 0.00            | 0.00                   | 0.00             | 0.00                             | 0.00               | 100%                                  | Caulk Gun          | Metal/Wood    |
| Chassis Prep | Dow Chemical     | Great Stuff    | Cleanup | Foam Cleanup Material | 7.26             | 100.00%                            | 70.00%                  | 30.00%            | 76.88%                  | 0.00%                           | 0.0093                 | 1.000               | 9.42                                                      | 2.18                             | 0.02            | 0.49                   | 0.09             | 0.00                             | #DIV/0!            | 50%                                   | Aerosol            | Cleaner/NA    |

|                          |              |              |             |             |             |             |
|--------------------------|--------------|--------------|-------------|-------------|-------------|-------------|
| <b>Potential to Emit</b> | <b>0.314</b> | <b>1.000</b> | <b>0.26</b> | <b>6.27</b> | <b>1.14</b> | <b>0.05</b> |
|--------------------------|--------------|--------------|-------------|-------------|-------------|-------------|

Transfer Efficiency - Hand or Manual Application = 100%, Aerosol = 50%

Actual Usage = 2.10 gallons/ 8 hour day  
Actual VOC emissions = 1.04 pounds per 8 hour day

**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)  
 PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 PTE PM/PM<sub>10</sub> (tons/yr) = (units/hour) \* (gal/unit) \* (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)

Maximum Gallons per 24 hour day = 7.53  
Maximum Pounds VOC per 24 hour day = 6.27

**HAZARDOUS AIR POLLUTANTS**

| Process      | Manufacturer     | Product Number | Use     | Description           | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|--------------|------------------|----------------|---------|-----------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|
| Chassis Prep | Sherwin Williams | S04114         | Coating | Gloss Black Paint     | 6.08             | 0.0420                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 21.00%           | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.23                       | 0.00                      | 0.23                         |
| Chassis Prep | Geocol Corp.     | 3300 Colors    | Sealant | Sealant               | 11.22            | 0.2500                         | 1.000               | 1.50%                  | 0.00%                  | 0.00%           | 1.00%        | 0.00%             | 0.00%         | 5.00%            | 0.18            | 0.00                             | 0.00                            | 0.12                      | 0.00                   | 0.00                        | 0.00                    | 0.61                       | 0.00                      |                              |
| Chassis Prep | Dow Chemical     | ENER45 SF      | Foam    | Expanding Foam        | 10.84            | 0.0125                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 15.00%       | 0.00%             | 0.00%         | 0.00%            | 0.00            | 0.00                             | 0.00                            | 0.09                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.92                      |                              |
| Chassis Prep | Dow Chemical     | Great Stuff    | Cleanup | Foam Cleanup Material | 7.26             | 0.0093                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00            | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.09                      |                              |

|                                         |             |             |             |             |             |             |             |             |             |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>Uncontrolled Potential Emissions</b> | <b>0.18</b> | <b>0.00</b> | <b>0.00</b> | <b>0.21</b> | <b>0.00</b> | <b>0.00</b> | <b>0.23</b> | <b>0.61</b> | <b>1.25</b> |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

**METHODOLOGY**

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Subfloor Installation (SF1)**

**Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009**

| Process    | Manufacturer    | Product Number | Use      | Description                 | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit /hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb/hr) | PTE VOC (lb/24 hr day) | PTE VOC (ton/yr) | PTE PM/PM <sub>10</sub> (ton/yr) | lb VOC/ gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate |
|------------|-----------------|----------------|----------|-----------------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|------------------------|----------------------|-----------------------------------------------------------|----------------------------------|-----------------|------------------------|------------------|----------------------------------|--------------------|---------------------------------------|--------------------|-----------|
| Sub Floors | Royal Adhesives | DC13039        | Adhesive | Spray Adhesive              | 5.90             | 77.20%                             | 28.56%                  | 48.64%            | 25.49%                  | 12.81%                          | 0.0710                 | 1.000                | 3.85                                                      | 2.87                             | 0.20            | 4.89                   | 0.89             | 0.21                             | 22.40              | 50%                                   | Aerosol            | Wood      |
| Sub Floors | Oatey Co.       | None           | Adhesive | Low VOC PVC Cement          | 7.67             | 90.00%                             | 10.00%                  | 80.00%            | 11.60%                  | 7.96%                           | 0.0155                 | 1.000                | 6.94                                                      | 6.14                             | 0.10            | 2.28                   | 0.42             | 0.00                             | 77.09              | 100%                                  | Brush              | Plastic   |
| Sub Floors | Oatey Co.       | DAP 4000       | Primer   | Plastic Pipe Primer/Cleaner | 6.59             | 100.00%                            | 15.00%                  | 85.00%            | 14.95%                  | 0.00%                           | 0.0175                 | 1.000                | 6.59                                                      | 5.60                             | 0.10            | 2.35                   | 0.43             | 0.00                             | #DIV/0!            | 100%                                  | Brush              | Plastic   |

|                          |             |              |             |             |             |             |
|--------------------------|-------------|--------------|-------------|-------------|-------------|-------------|
| <b>Potential to Emit</b> | <b>0.10</b> | <b>1.000</b> | <b>0.40</b> | <b>9.53</b> | <b>1.74</b> | <b>0.21</b> |
|--------------------------|-------------|--------------|-------------|-------------|-------------|-------------|

Transfer Efficiency - Hand or Manual Application = 100%, Aerosol = 50%

Actual Usage = 0.69 gallons/ 8 hour day

Actual VOC emissions = 3.18 pounds per 8 hour day

**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)

PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

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

PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

PTE PM/PM<sub>10</sub> (tons/yr) = (units/hour) \* (gal/unit) \* (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)

Maximum Gallons per 24 hour day = 2.50

Maximum Pounds VOC per 24 hour day = 9.53

**HAZARDOUS AIR POLLUTANTS**

| Process    | Manufacturer    | Product Number | Use      | Description                 | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|------------|-----------------|----------------|----------|-----------------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|
| Sub Floors | Royal Adhesives | DC13039        | Adhesive | Spray Adhesive              | 5.90             | 0.0710                         | 1.000               | 0.00%                  | 0.00%                  | 12.70%          | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.23                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.23                         |
| Sub Floors | Oatey Co.       | None           | Adhesive | Low VOC PVC Cement          | 7.67             | 0.0155                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Sub Floors | Oatey Co.       | DAP 4000       | Primer   | Plastic Pipe Primer/Cleaner | 6.59             | 0.0175                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |

|                                         |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>Uncontrolled Potential Emissions</b> | <b>0.00</b> | <b>0.00</b> | <b>0.23</b> | <b>0.00</b> | <b>0.23</b> | <b>0.00</b> | <b>0.23</b> |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Assembly Line Operations (ALO1)**

Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009

| Process  | Manufacturer     | Product Number | Use     | Description             | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Material (gal/unit) | Maximum (unit/hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb/hr) | PTE VOC (lb/24 hr day) | PTE VOC (ton/yr) | PTE PMPM <sub>10</sub> (ton/yr) | lb VOC/ gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate     |
|----------|------------------|----------------|---------|-------------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|----------------------------|---------------------|-----------------------------------------------------------|----------------------------------|-----------------|------------------------|------------------|---------------------------------|--------------------|---------------------------------------|--------------------|---------------|
| Assembly | Geocel           | 818107         | Sealant | Sealant - Colors        | 13.43            | 2.00%                              | 0.00%                   | 2.00%             | 0.00%                   | 96.42%                          | 0.0160                     | 1.000               | 0.27                                                      | 0.27                             | 0.00            | 0.10                   | 0.02             | 0.00                            | 0.28               | 100%                                  | Caulk Gun          | Metal/Plastic |
| Assembly | Geocel           | 2300           | Sealant | Sealant - Clear         | 7.72             | 37.83%                             | 0.00%                   | 37.83%            | 0.00%                   | 61.06%                          | 0.2300                     | 1.000               | 2.92                                                      | 2.92                             | 0.67            | 16.12                  | 2.94             | 0.00                            | 4.78               | 100%                                  | Caulk Gun          | Metal/Plastic |
| Assembly | Geocel           | 2350           | Sealant | Sealant - White         | 8.42             | 32.70%                             | 0.00%                   | 32.70%            | 0.00%                   | 63.28%                          | 0.1430                     | 1.000               | 2.75                                                      | 2.75                             | 0.39            | 9.45                   | 1.72             | 0.00                            | 4.35               | 100%                                  | Caulk Gun          | Metal/Plastic |
| Assembly | Schnee Morehead  | SM7100         | Sealant | Sealant - Wood          | 13.43            | 2.98%                              | 0.00%                   | 2.98%             | 0.00%                   | 94.67%                          | 0.0590                     | 1.000               | 0.40                                                      | 0.40                             | 0.02            | 0.57                   | 0.10             | 0.00                            | 0.42               | 100%                                  | Caulk Gun          | Wood          |
| Assembly | Sika             | 221            | Sealant | Sika Flex 221           | 10.51            | 4.05%                              | 0.00%                   | 4.05%             | 0.00%                   | 94.32%                          | 0.0460                     | 1.000               | 0.43                                                      | 0.43                             | 0.02            | 0.47                   | 0.09             | 0.00                            | 0.45               | 100%                                  | Caulk Gun          | Glass/Metal   |
| Assembly | Sika             | 521            | Sealant | Sika Flex 521           | 11.76            | 0.09%                              | 0.00%                   | 0.09%             | 0.00%                   | 99.86%                          | 0.0325                     | 1.000               | 0.01                                                      | 0.01                             | 0.00            | 0.01                   | 0.00             | 0.00                            | 0.01               | 100%                                  | Caulk Gun          | Glass/Metal   |
| Assembly | Sika             | 255            | Sealant | Sika Flex 255-FC        | 10.00            | 5.30%                              | 0.00%                   | 5.30%             | 0.00%                   | 92.93%                          | 0.0390                     | 1.000               | 0.53                                                      | 0.53                             | 0.02            | 0.50                   | 0.09             | 0.00                            | 0.57               | 100%                                  | Caulk Gun          | Glass/Metal   |
| Assembly | Sika             | 252            | Sealant | Sika Flex 252           | 10.01            | 5.48%                              | 0.00%                   | 5.48%             | 0.00%                   | 92.69%                          | 0.0340                     | 1.000               | 0.55                                                      | 0.55                             | 0.02            | 0.45                   | 0.08             | 0.00                            | 0.59               | 100%                                  | Caulk Gun          | Glass/Metal   |
| Assembly | Alpha Systems    | 1021           | Sealant | Low VOC Sealant         | 11.18            | 22.00%                             | 0.00%                   | 22.00%            | 0.00%                   | 62.16%                          | 1.1150                     | 1.000               | 2.46                                                      | 2.46                             | 2.74            | 65.82                  | 12.01            | 0.00                            | 3.96               | 100%                                  | Caulk Gun          | Wood          |
| Assembly | Cyclo            | C-111          | Cleaner | Brake and Parts Cleaner | 6.46             | 100.00%                            | 20.00%                  | 80.00%            | 19.55%                  | 0.00%                           | 0.0330                     | 1.000               | 6.42                                                      | 5.17                             | 0.17            | 4.09                   | 0.75             | 0.00                            | #DIV/0!            | 50%                                   | Aerosol            | Cleaner/NA    |
| Assembly | Russell Products | 911E           | Cleaner | Citrus Cleaner          | 7.01             | 100.00%                            | 20.00%                  | 80.00%            | 16.81%                  | 0.00%                           | 0.1600                     | 1.000               | 6.74                                                      | 5.61                             | 0.90            | 21.53                  | 3.93             | 0.00                            | #DIV/0!            | 100%                                  | Hand Wipe          | Cleaner/NA    |

|                          |              |              |             |               |              |             |
|--------------------------|--------------|--------------|-------------|---------------|--------------|-------------|
| <b>Potential to Emit</b> | <b>1.908</b> | <b>1.000</b> | <b>4.96</b> | <b>119.11</b> | <b>21.74</b> | <b>0.00</b> |
|--------------------------|--------------|--------------|-------------|---------------|--------------|-------------|

Transfer Efficiency - Hand or Manual Application/Non-Atomized Application = 100%, Aerosol = 50%

Actual Usage = 14.05 gallons/ 8 hour day  
Actual VOC emissions = 40.76 pounds per 8 hour day

**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)  
PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
PTE PMPM<sub>10</sub> (tons/yr) = (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)

Maximum Gallons per 24 hour day = 45.78  
Maximum Pounds VOC per 24 hour day = 119.11

**HAZARDOUS AIR POLLUTANTS**

| Process  | Manufacturer     | Product Number | Use     | Description             | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|----------|------------------|----------------|---------|-------------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|
| Assembly | Geocel           | 818107         | Sealant | Sealant - Colors        | 13.43            | 0.0160                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Assembly | Geocel           | 2300           | Sealant | Sealant - Clear         | 7.72             | 0.2300                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Assembly | Geocel           | 2350           | Sealant | Sealant - White         | 8.42             | 0.1430                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Assembly | Schnee Morehead  | SM7100         | Sealant | Sealant - Wood          | 13.43            | 0.0590                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 3.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.10                       | 0.00                      | 0.10                         |
| Assembly | Sika             | 221            | Sealant | Sika Flex 221           | 10.51            | 0.0460                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 1.00%        | 0.00%             | 0.00%         | 0.00%            | 2.50%           | 0.00                             | 0.00                            | 0.00                      | 0.02                   | 0.00                        | 0.00                    | 0.00                       | 0.05                      | 0.07                         |
| Assembly | Sika             | 521            | Sealant | Sika Flex 521           | 11.76            | 0.0325                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Assembly | Sika             | 255            | Sealant | Sika Flex 255-FC        | 10.00            | 0.0390                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 1.00%        | 0.00%             | 0.00%         | 0.00%            | 10.00%          | 0.00                             | 0.00                            | 0.00                      | 0.02                   | 0.00                        | 0.00                    | 0.00                       | 0.17                      | 0.19                         |
| Assembly | Sika             | 252            | Sealant | Sika Flex 252           | 10.01            | 0.0340                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 1.00%        | 0.00%             | 0.00%         | 0.00%            | 10.00%          | 0.00                             | 0.00                            | 0.00                      | 0.01                   | 0.00                        | 0.00                    | 0.00                       | 0.15                      | 0.16                         |
| Assembly | Alpha Systems    | 1021           | Sealant | Low VOC Sealant         | 11.18            | 1.1150                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Assembly | Cyclo            | C-111          | Cleaner | Brake and Parts Cleaner | 6.46             | 0.0330                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 40.00%           | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.37                       | 0.00                      | 0.37                         |
| Assembly | Russell Products | 911E           | Cleaner | Citrus Cleaner          | 7.01             | 0.1600                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |

|                                         |             |             |             |             |             |             |             |             |             |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>Uncontrolled Potential Emissions</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.05</b> | <b>0.00</b> | <b>0.00</b> | <b>0.48</b> | <b>0.37</b> | <b>0.90</b> |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Undercoat Bay (UC1)**

**Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009**

| Process   | Manufacturer   | Product Number | Use     | Description        | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb/hr) | PTE VOC (lb/24 hr day) | PTE VOC (ton/yr) | PTE PM/PM <sub>10</sub> (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate  |
|-----------|----------------|----------------|---------|--------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|------------------------|---------------------|-----------------------------------------------------------|----------------------------------|-----------------|------------------------|------------------|----------------------------------|-------------------|---------------------------------------|--------------------|------------|
| Undercoat | Z Technologies | 0104-AM-13G    | Coating | Z Shield Undercoat | 12.51            | 40.42%                             | 34.74%                  | 5.68%             | 52.11%                  | 44.00%                          | 1.0000                 | 1.000               | 1.48                                                      | 0.71                             | 0.71            | 17.05                  | 3.11             | 0.00                             | 1.61              | 100%                                  | Flow               | Metal      |
| Undercoat | NA             | NA             | Cleaner | Water              | 8.34             | 100.00%                            | 100.00%                 | 0.00%             | 100.00%                 | 0.00%                           | 0.1250                 | 1.000               | 0.00                                                      | 0.00                             | 0.00            | 0.00                   | 0.00             | 0.00                             | #DIV/0!           | 100%                                  | Hand Wipe          | Cleanup/NA |

|                          |              |              |             |              |             |             |
|--------------------------|--------------|--------------|-------------|--------------|-------------|-------------|
| <b>Potential to Emit</b> | <b>1.125</b> | <b>1.000</b> | <b>0.71</b> | <b>17.05</b> | <b>3.11</b> | <b>0.00</b> |
|--------------------------|--------------|--------------|-------------|--------------|-------------|-------------|

Transfer Efficiency - Hand or Manual Application = 100%, Flow = 100%

Actual Usage = 8.0 gallons/ 8 hour day  
Actual VOC emissions = 5.68 pounds per 8 hour day

**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)  
 PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 PTE PM/PM<sub>10</sub> (tons/yr) = (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)

Maximum Gallons per 24 hour day = 27.00  
Maximum Pounds VOC per 24 hour day = 17.05

**HAZARDOUS AIR POLLUTANTS**

| Process   | Manufacturer   | Product Number | Use     | Description        | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|-----------|----------------|----------------|---------|--------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|
| Undercoat | Z Technologies | 0104-AM-13G    | Coating | Z Shield Undercoat | 12.51            | 1.0000                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Undercoat | NA             | NA             | Cleaner | Water              | 8.34             | 0.1250                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |

|                                         |             |             |             |             |             |             |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>Uncontrolled Potential Emissions</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Touch-up Painting Station (TP1)**

Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009

| Process                  | Manufacturer     | Product Number | Use     | Description         | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb/hr) | PTE VOC (lb/24 hr day) | PTE VOC (ton/yr) | PTE PM/PM <sub>10</sub> (ton/yr) | lb VOC/ gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate  |  |  |  |
|--------------------------|------------------|----------------|---------|---------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|------------------------|---------------------|-----------------------------------------------------------|----------------------------------|-----------------|------------------------|------------------|----------------------------------|--------------------|---------------------------------------|--------------------|------------|--|--|--|
| Touchup Paint            | Sherwin Williams | MB-LF          | Paint   | Non-Lead Colors     | 7.50             | 77.40%                             | 6.00%                   | 71.40%            | 6.81%                   | 22.60%                          | 0.0105                 | 1.000               | 5.75                                                      | 5.36                             | 0.06            | 1.35                   | 0.25             | 0.02                             | 23.69              | 75%                                   | HVLP               | Plastic    |  |  |  |
| Touchup Paint            | Sherwin Williams | 8010PCCH690    | Paint   | Base/Clear Hardener | 7.84             | 36.35%                             | 0.00%                   | 36.35%            | 0.00%                   | 15.00%                          | 0.0286                 | 1.000               | 2.85                                                      | 2.85                             | 0.08            | 1.96                   | 0.36             | 0.16                             | 19.00              | 75%                                   | HVLP               | Plastic    |  |  |  |
| Touchup Paint            | Sherwin Williams | Ultra 7000     | Paint   | Clearcoat           | 8.76             | 45.11%                             | 0.00%                   | 45.11%            | 0.00%                   | 59.50%                          | 0.0127                 | 1.000               | 3.95                                                      | 3.95                             | 0.05            | 1.20                   | 0.22             | 0.07                             | 6.64               | 75%                                   | HVLP               | Plastic    |  |  |  |
| Touchup Paint            | Martin Senour    | 166-1600       | Cleaner | Mineral Spirits     | 6.35             | 100.00%                            | 0.00%                   | 100.00%           | 0.00%                   | 0.00%                           | 0.0270                 | 1.000               | 6.35                                                      | 6.35                             | 0.17            | 4.11                   | 0.75             | 0.00                             | #DIV/0!            | 100%                                  | Hand Wipe          | Cleaner/NA |  |  |  |
| <b>Potential to Emit</b> |                  |                |         |                     |                  |                                    |                         |                   |                         |                                 |                        |                     |                                                           | <b>0.079</b>                     | <b>1.000</b>    | <b>0.36</b>            | <b>8.62</b>      | <b>1.57</b>                      | <b>0.24</b>        |                                       |                    |            |  |  |  |

Transfer Efficiency - Hand or Manual Application = 100%, Aerosol = 50%, HVLP = 75%

Actual Usage = 0.41 gallons/ 8 hour day  
Actual VOC emissions = 2.87 pounds per 8 hour day

**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)  
 PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 PTE PM/PM<sub>10</sub> (tons/yr) = (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)

Maximum Gallons per 24 hour day = 1.89  
Maximum Pounds VOC per 24 hour day = 8.62

**HAZARDOUS AIR POLLUTANTS**

| Process                                 | Manufacturer     | Product Number | Use     | Description         | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |  |  |  |  |  |  |
|-----------------------------------------|------------------|----------------|---------|---------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|--|--|--|--|--|--|
| Touchup Paint                           | Sherwin Williams | MB-LF          | Paint   | Non-Lead Colors     | 7.50             | 0.0105                         | 1.000               | 7.00%                  | 3.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 35.00%          | 0.02                             | 0.01                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.12                      | 0.16                         |  |  |  |  |  |  |
| Touchup Paint                           | Sherwin Williams | 8010PCCH690    | Paint   | Base/Clear Hardener | 7.84             | 0.0286                         | 1.000               | 1.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 24.00%          | 0.01                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.24                      | 0.25                         |  |  |  |  |  |  |
| Touchup Paint                           | Sherwin Williams | Ultra 7000     | Paint   | Clearcoat           | 8.76             | 0.0127                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 9.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.04                    | 0.00                       | 0.04                      |                              |  |  |  |  |  |  |
| Touchup Paint                           | Martin Senour    | 166-1600       | Cleaner | Mineral Spirits     | 6.35             | 0.0270                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |  |  |  |  |  |  |
| <b>Uncontrolled Potential Emissions</b> |                  |                |         |                     |                  |                                |                     |                        |                        |                 |              |                   |               |                  |                 | <b>0.03</b>                      | <b>0.01</b>                     | <b>0.00</b>               | <b>0.00</b>            | <b>0.00</b>                 | <b>0.04</b>             | <b>0.00</b>                | <b>0.36</b>               | <b>0.44</b>                  |  |  |  |  |  |  |

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Final Finish Operations (FF1)**

Company Name: Damon Corporation  
Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516  
Permit No.: 039-27082-00683  
Prepared By: D&B Environmental Services, Inc.  
Date: January 30, 2009

| Process      | Manufacturer    | Product Number | Use     | Description        | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | VOC Content (Pounds VOC per gallon of coating less water) | Pounds VOC per gallon of coating | PTE VOC (lb VOC /hr) | PTE VOC (lb VOC / 24 hr day) | PTE VOC (ton/yr) | PTE PM/PM <sub>10</sub> (ton/yr) | lb VOC/ gal solids | Transfer Efficiency (See Notes Below) | Application Method | Substrate            |
|--------------|-----------------|----------------|---------|--------------------|------------------|------------------------------------|-------------------------|-------------------|-------------------------|---------------------------------|------------------------|---------------------|-----------------------------------------------------------|----------------------------------|----------------------|------------------------------|------------------|----------------------------------|--------------------|---------------------------------------|--------------------|----------------------|
| Final Finish | Rollie Williams | 4-PLT          | Cleaner | Pure Grade Lacquer | 7.07             | 100.0%                             | 0.00%                   | 100.00%           | 0.00%                   | 0.00%                           | 0.1700                 | 1.000               | 7.07                                                      | 7.07                             | 1.2019               | 28.85                        | 5.26             | 0.00                             | #DIV/0!            | 100%                                  | Hand Wipe          | Wood                 |
| Final Finish | Various         | IPA            | Cleaner | Isopropyl Alcohol  | 6.59             | 100.0%                             | 0.00%                   | 100.00%           | 0.00%                   | 0.00%                           | 0.1790                 | 1.000               | 6.59                                                      | 6.59                             | 1.180                | 28.31                        | 5.17             | 0.00                             | #DIV/0!            | 100%                                  | Hand Wipe          | Plastic, Metal, Wood |
| Final Finish | Johnson         | 94430          | Cleaner | Pledge             | 7.63             | 16.8%                              | 0.00%                   | 16.80%            | 0.00%                   | 82.91%                          | 0.0078                 | 1.000               | 1.28                                                      | 1.28                             | 0.01                 | 0.24                         | 0.04             | 0.11                             | 1.55               | 50%                                   | Aerosol            | Wood                 |
| Final Finish | Cyclo           | C-31           | Cleaner | Glass Cleaner      | 8.17             | 99.9%                              | 87.90%                  | 12.00%            | 86.11%                  | 2.14%                           | 0.0390                 | 1.000               | 7.06                                                      | 0.98                             | 0.04                 | 0.92                         | 0.17             | 0.00                             | 45.81              | 50%                                   | Aerosol            | Glass                |

|                          |              |              |             |              |              |             |
|--------------------------|--------------|--------------|-------------|--------------|--------------|-------------|
| <b>Potential to Emit</b> | <b>0.396</b> | <b>1.000</b> | <b>2.43</b> | <b>58.31</b> | <b>10.64</b> | <b>0.11</b> |
|--------------------------|--------------|--------------|-------------|--------------|--------------|-------------|

Transfer Efficiency - Hand or Manual Application = 100%, Aerosol = 50%, Airless = 65%

Actual VOC emissions = 9.82 pounds per 8 hour day

**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)  
PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
PTE PM/PM<sub>10</sub> (tons/yr) = (units/hour) \* (gal/unit) \* (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)

Maximum Gallons per 24 hour day = 9.50  
Maximum Pounds VOC per 24 hour day = 58.31

**HAZARDOUS AIR POLLUTANTS**

| Process      | Manufacturer    | Product Number | Use     | Description        | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Hexane | Weight % MDI | Weight % Methanol | Weight % MIBK | Weight % Toluene | Weight % Xylene | Ethyl Benzene Emissions (ton/yr) | Glycol Ether Emissions (ton/yr) | Hexane Emissions (ton/yr) | MDI Emissions (ton/yr) | Methanol Emissions (ton/yr) | MIBK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|--------------|-----------------|----------------|---------|--------------------|------------------|--------------------------------|---------------------|------------------------|------------------------|-----------------|--------------|-------------------|---------------|------------------|-----------------|----------------------------------|---------------------------------|---------------------------|------------------------|-----------------------------|-------------------------|----------------------------|---------------------------|------------------------------|
| Final Finish | Rollie Williams | 4-PLT          | Cleaner | Pure Grade Lacquer | 7.07             | 0.1700                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 9.38%             | 0.00%         | 66.28%           | 5.59%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.49                        | 0.00                    | 3.49                       | 0.29                      | 4.28                         |
| Final Finish | Various         | IPA            | Cleaner | Isopropyl Alcohol  | 6.59             | 0.1790                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Final Finish | Johnson         | 94430          | Cleaner | Pledge             | 7.63             | 0.0078                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |
| Final Finish | Cyclo           | C-31           | Cleaner | Glass Cleaner      | 8.17             | 0.0390                         | 1.000               | 0.00%                  | 0.00%                  | 0.00%           | 0.00%        | 0.00%             | 0.00%         | 0.00%            | 0.00%           | 0.00                             | 0.00                            | 0.00                      | 0.00                   | 0.00                        | 0.00                    | 0.00                       | 0.00                      | 0.00                         |

|                                         |             |             |             |             |             |             |             |             |             |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>Uncontrolled Potential Emissions</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.49</b> | <b>0.00</b> | <b>3.49</b> | <b>0.29</b> | <b>4.28</b> |
|-----------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

**METHODOLOGY**

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

**Emissions Calculations  
Welding and Thermal Cutting (WC1)**

**Company Name: Damon Corporation**  
**Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516**  
**Permit No.: 039-27082-00683**  
**Prepared By: D&B Environmental Services, Inc.**  
**Date: January 30, 2009**

| PROCESS                       | Number of Stations | Max. electrode or carbon steel consumption per station (lbs/hr) |                                         | EMISSION FACTORS*<br>(lb pollutant/lb electrode or carbon steel) |        |    |    | EMISSIONS<br>(lbs/hr) |        |      |      | HAPS<br>(lbs/hr) |
|-------------------------------|--------------------|-----------------------------------------------------------------|-----------------------------------------|------------------------------------------------------------------|--------|----|----|-----------------------|--------|------|------|------------------|
|                               |                    |                                                                 |                                         | PM = PM <sub>10</sub>                                            | Mn     | Ni | Cr | PM = PM <sub>10</sub> | Mn     | Ni   | Cr   |                  |
| WELDING                       |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
| Metal Inert Gas (MIG)(E70S-3) | 1.00               | 0.857                                                           |                                         | 0.0051                                                           | 0.0003 |    |    | 0.004                 | 0.0003 | 0.00 | 0.00 | 0.0003           |
|                               |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
| FLAME CUTTING                 | Number of Stations | Max. Metal Thickness<br>Cut (in.)                               | Max. Metal Cutting Rate<br>(in./minute) | EMISSION FACTORS<br>(lb pollutant/1,000 inches cut, 1" thick)**  |        |    |    | EMISSIONS<br>(lbs/hr) |        |      |      | HAPS<br>(lbs/hr) |
|                               |                    |                                                                 |                                         | PM = PM <sub>10</sub>                                            | Mn     | Ni | Cr | PM = PM <sub>10</sub> | Mn     | Ni   | Cr   |                  |
| Plasma**                      | 1.00               | 0.375                                                           | 12.0                                    | 0.0039                                                           |        |    |    | 0.001                 | 0.00   | 0.00 | 0.00 | 0.00             |
| Oxy-Acetylene Torch           | 1.00               | 0.750                                                           | 12.0                                    | 0.1622                                                           |        |    |    | 0.088                 | 0.00   | 0.00 | 0.00 | 0.00             |
|                               |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
| <b>EMISSION TOTALS</b>        |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
|                               |                    |                                                                 |                                         |                                                                  |        |    |    | PM = PM <sub>10</sub> | Mn     | Ni   | Cr   |                  |
| Potential Emissions lbs/hr    |                    |                                                                 |                                         |                                                                  |        |    |    | 0.005                 | 0.0003 | 0.00 | 0.00 | 0.0003           |
|                               |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
| Potential Emissions lbs/day   |                    |                                                                 |                                         |                                                                  |        |    |    | 0.13                  | 0.006  | 0.00 | 0.00 | 0.006            |
|                               |                    |                                                                 |                                         |                                                                  |        |    |    |                       |        |      |      |                  |
| Potential Emissions tons/year |                    |                                                                 |                                         |                                                                  |        |    |    | 0.02                  | 0.001  | 0.00 | 0.00 | 0.001            |

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

An equivalence of carbon steel to pounds of weld wire consumed was assumed for spot welding. Also, a conservative assumption was made that half of the process weight rate of the welding activities (75 lbs carbon steel) is the worst case going through the spot welder.

Using AWS average values:  $(0.25 \text{ g/min}) / (3.6 \text{ m/min}) \times (0.0022 \text{ lb/g}) / (39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0.0039 \text{ lb/1,000 in. cut, 8 mm thick}$   
 Plasma cutting emissions, lb/hr:  $(\# \text{ of stations})(\text{max. cutting rate, in./min.})(60 \text{ min./hr.})(\text{emission factor, lb. pollutant/1,000 in. cut, 8 mm thick})$   
 Cutting emissions, lb/hr:  $(\# \text{ of stations})(\text{max. metal thickness, in.})(\text{max. cutting rate, in./min.})(60 \text{ min./hr.})(\text{emission factor, lb. pollutant/1,000 in. cut, 1})$   
 Welding emissions, lb/hr:  $(\# \text{ of stations})(\text{max. lbs of electrode used/hr/station})(\text{emission factor, lb. pollutant/lb. of electrode used})$   
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Process Particulate Emissions  
Woodworking Activities (WW1)**

**Company Name: Damon Corporation**  
**Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516**  
**Permit No.: 039-27082-00683**  
**Prepared By: D&B Environmental Services, Inc.**  
**Date: January 30, 2009**

**Potential Emissions (tons/year)**

**DUST COLLECTOR**

| Process | No. of Units | Airflow (acfm) | Grain Loading per Actual Cubic Foot of Outlet Air | Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> ) | Total Filter Area (ft <sup>2</sup> ) | Control Efficiency | Total (tons/yr) | Can Comply with 326 IAC 6-3-2? (lbs/hr) |
|---------|--------------|----------------|---------------------------------------------------|-----------------------------------------------------|--------------------------------------|--------------------|-----------------|-----------------------------------------|
| DC1     | 1            | 5,900          | 0.001                                             | 9.46                                                | 624.00                               | 99.00%             | 0.22            | YES                                     |
| DC2     | 1            | 5,900          | 0.001                                             | 9.46                                                | 624.00                               | 99.00%             | 0.22            | YES                                     |
| DC3     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |
| DC4     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |
| DC5     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |
| DC6     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |
| DC7     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |
| DC8     | 1            | 1,300          | 0.001                                             | 40.63                                               | 32.00                                | 99.00%             | 0.05            | YES                                     |

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (tons/year) **0.74**

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (lb/hr) **0.17**

|                                      |                                                       |              |                               |             |  |
|--------------------------------------|-------------------------------------------------------|--------------|-------------------------------|-------------|--|
|                                      |                                                       |              | <b>DC3 through DC8 (each)</b> |             |  |
|                                      |                                                       | <b>DC1</b>   | <b>DC2</b>                    |             |  |
| <b>Allowable Emission (lb/hr) =</b>  | <b>4.10 X [Process Weight Rate ]<sup>0.67</sup> =</b> | <b>1.62</b>  | <b>1.62</b>                   | <b>0.35</b> |  |
| <b>Material Input Rate (lb/hr) =</b> |                                                       | <b>500.0</b> | <b>500.0</b>                  | <b>50.0</b> |  |

**Methodology:**

**Potential Emission (uncontrolled):**

Potential Emission(tons/yr) = [No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)]

**Potential Emission (controlled):**

Potential Emission (tons/yr) = [No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs]

### Natural Gas Combustion (NGC1)

**Company Name:** Damon Corporation  
**Address City IN Zip:** 604 Middleton Run Road, Elkhart, Indiana 46516  
**Permit No.:** 039-27082-00683  
**Prepared By:** D&B Environmental Services, Inc.  
**Date:** January 30, 2009

| Description        | Number of Emission Units | Emission Unit ID | Heat Input Capacity Per Unit (MMBtu/hr) | Total Maximum Potential Throughput (MMCF/yr) |
|--------------------|--------------------------|------------------|-----------------------------------------|----------------------------------------------|
| Office Heater      | 1                        | OH1              | 0.080                                   | 0.69                                         |
| Office Heater      | 1                        | OH2              | 0.060                                   | 0.52                                         |
| Breakroom Heater   | 1                        | BH1              | 0.080                                   | 0.69                                         |
| Air Makeup Units   | 6                        | AM1 through AM6  | 0.580                                   | 29.89                                        |
| Radiant Heaters    | 1                        | RH1              | 0.072                                   | 0.62                                         |
| Radiant Heaters    | 5                        | RH2 through RH6  | 0.100                                   | 4.29                                         |
| Radiant Heaters    | 1                        | RH7              | 0.080                                   | 0.69                                         |
| Infrared Heaters   | 2                        | IR1 and IR2      | 0.125                                   | 2.15                                         |
| Forced Air Furnace | 1                        | SH1              | 0.100                                   | 0.86                                         |
| Forced Air Furnace | 1                        | SH2              | 0.100                                   | 0.86                                         |
| <b>TOTALS</b>      | <b>20</b>                |                  | <b>4.80</b>                             | <b>41.24</b>                                 |

| Emission Factor (lbs/MMCF) |                    |                 |       |      |     |      |
|----------------------------|--------------------|-----------------|-------|------|-----|------|
| PM*                        | PM <sub>10</sub> * | SO <sub>2</sub> | NOX** | CO   | VOC | HAPs |
| 1.9                        | 7.6                | 0.6             | 100   | 84.0 | 5.5 | 0.09 |

| Potential To Emit (tons/yr) |             |                  |                 |             |             |             |                |
|-----------------------------|-------------|------------------|-----------------|-------------|-------------|-------------|----------------|
| Emission Unit ID            | PM          | PM <sub>10</sub> | SO <sub>2</sub> | NOX         | CO          | VOC         | HAPs           |
| OH1                         | 0.00        | 0.00             | 0.00            | 0.03        | 0.03        | 0.00        | 3.0E-05        |
| OH2                         | 0.00        | 0.00             | 0.00            | 0.03        | 0.02        | 0.00        | 2.2E-05        |
| BH1                         | 0.00        | 0.00             | 0.00            | 0.03        | 0.03        | 0.00        | 3.0E-05        |
| AM1 through AM6             | 0.03        | 0.11             | 0.01            | 1.49        | 1.26        | 0.08        | 1.3E-03        |
| RH1                         | 0.00        | 0.00             | 0.00            | 0.03        | 0.03        | 0.00        | 2.7E-05        |
| RH2 through RH6             | 0.00        | 0.02             | 0.00            | 0.21        | 0.18        | 0.01        | 1.9E-04        |
| RH7                         | 0.00        | 0.00             | 0.00            | 0.03        | 0.03        | 0.00        | 3.0E-05        |
| IR1 and IR2                 | 0.00        | 0.01             | 0.00            | 0.11        | 0.09        | 0.01        | 9.3E-05        |
| SH1                         | 0.00        | 0.00             | 0.00            | 0.04        | 0.04        | 0.00        | 3.7E-05        |
| SH2                         | 0.00        | 0.00             | 0.00            | 0.04        | 0.04        | 0.00        | 3.7E-05        |
| <b>TOTALS</b>               | <b>0.04</b> | <b>0.16</b>      | <b>0.01</b>     | <b>2.06</b> | <b>1.73</b> | <b>0.11</b> | <b>1.8E-03</b> |

\* PM and PM<sub>10</sub> emission factor are for condensable and filterable PM and PM10 combined.

\*\*Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

#### **METHODOLOGY**

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,020 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.

**Process Particulate Emissions  
Miscellaneous Particulate Emissions (MPE1)**

**Company Name: Damon Corporation**  
**Address City IN Zip: 604 Middleton Run Road, Elkhart, Indiana 46516**  
**Permit No.: 039-27082-00683**  
**Prepared By: D&B Environmental Services, Inc.**  
**Date: January 30, 2009**

|                                                                 |                         |   |       |                                  |   |        |                    |   |        |                       |   |       |                   |   |      |                         |
|-----------------------------------------------------------------|-------------------------|---|-------|----------------------------------|---|--------|--------------------|---|--------|-----------------------|---|-------|-------------------|---|------|-------------------------|
| <b>One (1) Abrasive Chop Saw MPE1 to Cut Metal Exhaust Pipe</b> |                         |   |       |                                  |   |        |                    |   |        |                       |   |       |                   |   |      |                         |
| 2.00                                                            | cuts/hr                 | x | 4.000 | in diameter pipe                 | x | 3.14   | pi                 | x | 0.1875 | in thick<br>pipe wall | x | 0.125 | in thick<br>blade | = | 0.59 | in <sup>3</sup> loss/hr |
| 0.59                                                            | in <sup>3</sup> loss/hr | / | 1,728 | in <sup>3</sup> /ft <sup>3</sup> | x | 501.12 | lb/ft <sup>3</sup> | = | 0.17   | lb loss/hr            |   |       |                   |   |      |                         |

|                                                                         |                         |   |       |                                  |   |        |                    |   |       |            |   |        |                         |  |  |  |  |
|-------------------------------------------------------------------------|-------------------------|---|-------|----------------------------------|---|--------|--------------------|---|-------|------------|---|--------|-------------------------|--|--|--|--|
| <b>Two (2) Aluminum Chop/Mitre Saws MPE2, MPE3 to Cut Aluminum Trim</b> |                         |   |       |                                  |   |        |                    |   |       |            |   |        |                         |  |  |  |  |
| 10.00                                                                   | cuts/hr                 | x | 2.00  | in long                          | x | 0.125  | in thick           | x | 0.125 | in wide    | = | 0.3125 | in <sup>3</sup> loss/hr |  |  |  |  |
| 0.31                                                                    | in <sup>3</sup> loss/hr | / | 1,728 | in <sup>3</sup> /ft <sup>3</sup> | x | 168.43 | lb/ft <sup>3</sup> | = | 0.03  | lb loss/hr |   |        |                         |  |  |  |  |

|                                                  |                         |   |       |                                  |   |       |                    |   |       |            |   |        |                         |  |  |  |  |
|--------------------------------------------------|-------------------------|---|-------|----------------------------------|---|-------|--------------------|---|-------|------------|---|--------|-------------------------|--|--|--|--|
| <b>Three (3) Wood Band Saws MPE4, MPE5, MPE6</b> |                         |   |       |                                  |   |       |                    |   |       |            |   |        |                         |  |  |  |  |
| 15.00                                            | cuts/hr                 | x | 1.50  | in long                          | x | 1.50  | in thick           | x | 0.125 | in wide    | = | 4.2188 | in <sup>3</sup> loss/hr |  |  |  |  |
| 4.22                                             | in <sup>3</sup> loss/hr | / | 1,728 | in <sup>3</sup> /ft <sup>3</sup> | x | 40.00 | lb/ft <sup>3</sup> | = | 0.10  | lb loss/hr |   |        |                         |  |  |  |  |

|                                                  |                         |   |       |                                  |   |       |                    |   |        |                       |   |       |                   |   |      |                         |
|--------------------------------------------------|-------------------------|---|-------|----------------------------------|---|-------|--------------------|---|--------|-----------------------|---|-------|-------------------|---|------|-------------------------|
| <b>Two (1) Mitre Saws MPE7, MPE8 to PVC Pipe</b> |                         |   |       |                                  |   |       |                    |   |        |                       |   |       |                   |   |      |                         |
| 20.00                                            | cuts/hr                 | x | 2.000 | in diameter pipe                 | x | 3.14  | pi                 | x | 0.1875 | in thick<br>pipe wall | x | 0.125 | in thick<br>blade | = | 2.95 | in <sup>3</sup> loss/hr |
| 2.95                                             | in <sup>3</sup> loss/hr | / | 1,728 | in <sup>3</sup> /ft <sup>3</sup> | x | 87.71 | lb/ft <sup>3</sup> | = | 0.15   | lb loss/hr            |   |       |                   |   |      |                         |

|                       |      |            |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|-----------------------|------|------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| Total Loss Estimate = | 0.45 | lb loss/hr |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Total Loss Estimate = | 1.96 | tons/year  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

| Coating                     | Substrate      | Volume % Water & Exempt | Maximum Usage (gal / 24 hr) | Maximum Usage (lb/hr) | VOC Content (Pounds VOC per gallon of coating less water) | ( $\sum C \times U$ ) | ( $\sum U$ ) | Volume Weighted VOC Content of Coatings for listed operations (lb/gal) less water and exempt VOC | 326 IAC 8-2 Emission Limit |
|-----------------------------|----------------|-------------------------|-----------------------------|-----------------------|-----------------------------------------------------------|-----------------------|--------------|--------------------------------------------------------------------------------------------------|----------------------------|
| <b>Assembly Line (ALO1)</b> |                |                         |                             |                       |                                                           |                       |              |                                                                                                  |                            |
| Brake and Parts Cleaner     | Metal, Plastic | 19.55%                  | 0.79                        | 0.21                  | 6.42                                                      | 5.09                  | 13.76        | 2.34                                                                                             | 3.50                       |
| Sealant - Colors            | Metal/Plastic  | 0.00%                   | 0.38                        | 0.21                  | 0.27                                                      | 0.10                  |              |                                                                                                  |                            |
| Sealant - Clear             | Metal/Plastic  | 0.00%                   | 5.52                        | 1.78                  | 2.92                                                      | 16.12                 |              |                                                                                                  |                            |
| Sealant - White             | Metal/Plastic  | 0.00%                   | 3.43                        | 1.20                  | 2.75                                                      | 9.45                  |              |                                                                                                  |                            |
| Sika Flex 221               | Glass/Metal    | 0.00%                   | 1.10                        | 0.48                  | 0.43                                                      | 0.47                  |              |                                                                                                  |                            |
| Sika Flex 521               | Glass/Metal    | 0.00%                   | 0.78                        | 0.38                  | 0.01                                                      | 0.01                  |              |                                                                                                  |                            |
| Sika Flex 255-FC            | Glass/Metal    | 0.00%                   | 0.94                        | 0.39                  | 0.53                                                      | 0.50                  |              |                                                                                                  |                            |
| Sika Flex 252               | Glass/Metal    | 0.00%                   | 0.82                        | 0.34                  | 0.55                                                      | 0.45                  |              |                                                                                                  |                            |
| <b>Undercoating (UC1)</b>   |                |                         |                             |                       |                                                           |                       |              |                                                                                                  |                            |
| Z Shield                    | Metal          | 52.11%                  | 24.00                       | 0.71                  | 1.48                                                      | 35.61                 | 24.00        | 1.48                                                                                             | 4.30                       |