



# 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: November 20, 2009

RE: Dometic LLC / 039-28368-00699

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 Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Dometic LLC**  
**2310 Industrial Parkway**  
**Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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.: M039-28368-00699	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2009 Expiration Date: November 20, 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 rigid polyurethane production and operation of refrigeration equipment insulation for recreational vehicle industry.

Source Address:	2310 Industrial Parkway, Elkhart, In 46516
Mailing Address:	2310 industrial Parkway, Elkhart, In 46516
General Source Phone Number:	(574)294-2511
SIC Code:	3630
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### (a) Foam Insulation Operations:

Rigid polyurethane foam is applied as insulation inside refrigerator components including fresh food doors, freezer doors, cabinets and cooling units. The source has four (4) production lines for insulating cabinets and cooling units, five (5) door foaming areas for insulating fresh food and freezer doors, and one (1) service area line. The rigid polyurethane foam is created by mixing three (3) components: Diphenylmethane-diisocyanate (PMDI), Polyol, and Cyclopentane. Polyol and Cyclopentane are preblended in one (1) sealed blending station to form a mixture containing 10% cyclopentane, before being pumped to one (1) of three (3) 65 gallon day tanks, which then supplies the material to one of three metering units depending on the production line needs. The metering units supply a regulated volume of polyol/cyclopentane mixture and PMDI to mix heads in each of the production line. The emissions from the blending station and metering units are exhausted to vents Blend1, A45, A69, and AD12345.

- (1) Metering unit one (1), supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A4 and A5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum rate of 31.3 units per hour each and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A4a, A4b and A5a, A5b respectively.
- (2) Metering unit two (2), supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A6 and A9, approved for construction in 2009, utilizing flow coating insulate paper, plastic and metal components at a maximum rate of 18.8 and 5.6 units per hour respectively and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A6a, A6b, and A9a, A9b respectively.

- (3) Metering unit three (3), supplying five (5) door foaming lines for insulating refrigerator fresh food and freezer doors, identified as emission units AD1, AD2, AD3, AD4, and AD5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum 40 units per hour each and 4.0 pound of polyurethane foam per unit, with emissions uncontrolled and exhausting to vents AD1, AD2, AD3, AD4, and AD5 respectively.
  - (4) Metering unit three (3), supplying one (1) service area line for insulating refrigerator cooling units, identified as emission unit service area, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum six (6) units per hour and 2.8 pounds of polyurethane foam per unit, with emissions uncontrolled and exhausting to vent Service Area.
- (b) Storage Tanks:
- (1) One (1) underground cyclopentane storage tank, identified as T001, with a maximum storage capacity of 9,200 gallons, maximum yearly throughput of 38,100 gallons per year, uncontrolled and venting to the atmosphere.
  - (2) Two (2) indoor aboveground Diphenylmethane - diisocyanate (PMDI) storage tanks, collectively identified as T002, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, maximum yearly throughput of 228,000 gallons per year, uncontrolled and venting to the atmosphere.
  - (3) Two (2) indoor aboveground Polyol storage tanks, collectively identified as T003, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, with a negligible emissions of volatile organic compounds, maximum combined yearly throughput of 180,950.00 gallons per year, uncontrolled and venting to the atmosphere.
- (c) Natural Gas-fired space heaters:
- (1) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 8.0 MMBtu/hr, exhausting outside through vent S001.
  - (2) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.5 MMBtu/hr, exhausting outside through vent S002.
  - (3) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.18 MMBtu/hr, exhausting outside through vent S003.
  - (4) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S004.
  - (5) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S005.
  - (6) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S006.

## **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 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 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, M039-28368-00699, 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.5 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.6 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.7 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.8 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.9 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.10 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.11 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 and Enforcement 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.12 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 and Enforcement 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-28368-00699 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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.15 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  
Permit Administration and Support Section, 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.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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.17 Source Modification Requirement

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

**B.18 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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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.19 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  
Permit Administration and Support Section, 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.20 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.21 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 construct and 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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 and Enforcement Branch, 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 start-up, 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 and Enforcement Branch, 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 start-up, 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:

#### (a) Foam Insulation Operations:

Rigid polyurethane foam is applied as insulation inside refrigerator components including fresh food doors, freezer doors, cabinets and cooling units. The source has four (4) production lines for insulating cabinets and cooling units, five (5) door foaming areas for insulating fresh food and freezer doors, and one (1) service area line. The rigid polyurethane foam is created by mixing three (3) components: Diphenylmethane-diisocyanate (PMDI), Polyol, and Cyclopentane. Polyol and Cyclopentane are preblended in one (1) sealed blending station to form a mixture containing 10% cyclopentane, before being pumped to one (1) of three (3) 65 gallon day tanks, which then supplies the material to one of three metering units depending on the production line needs. The metering units supply a regulated volume of polyol/cyclopentane mixture and PMDI to mix heads in each of the production line. The emissions from the blending station and metering units are exhausted to vents Blend1, A45, A69, and AD12345.

- (1) Metering unit one (1), supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A4 and A5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum rate of 31.3 units per hour each and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A4a, A4b and A5a, A5b respectively.
- (2) Metering unit two (2), supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A6 and A9, approved for construction in 2009, utilizing flow coating insulate paper, plastic and metal components at a maximum rate of 18.8 and 5.6 units per hour respectively and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A6a, A6b, and A9a, A9b respectively.
- (3) Metering unit three (3), supplying five (5) door foaming lines for insulating refrigerator fresh food and freezer doors, identified as emission units AD1, AD2, AD3, AD4, and AD5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum 40 units per hour each and 4.0 pound of polyurethane foam per unit, with emissions uncontrolled and exhausting to vents AD1, AD2, AD3, AD4, and AD5 respectively.
- (4) Metering unit three (3), supplying one (1) service area line for insulating refrigerator cooling units, identified as emission unit service area, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum six (6) units per hour and 2.8 pounds of polyurethane foam per unit, with emissions uncontrolled and exhausting to vent Service Area.

#### (b) Storage Tanks:

- (1) One (1) underground cyclopentane storage tank, identified as T001, with a maximum storage capacity of 9,200 gallons, maximum yearly throughput of 38,100 gallons per year, uncontrolled and venting to the atmosphere.
- (2) Two (2) indoor aboveground Diphenylmethane - diisocyanate (PMDI) storage tanks, collectively identified as T002, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, maximum yearly throughput of 228,000 gallons per year, uncontrolled and venting to the atmosphere.
- (3) Two (2) indoor aboveground Polyol storage tanks, collectively identified as T003, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, with a negligible emissions of volatile organic compounds, maximum combined yearly throughput of 180,950.00 gallons per year, uncontrolled and venting to the atmosphere.

- (c) Natural Gas-fired space heaters:
- (1) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 8.0 MMBtu/hr, exhausting outside through vent S001.
  - (2) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.5 MMBtu/hr, exhausting outside through vent S002.
  - (3) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.18 MMBtu/hr, exhausting outside through vent S003.
  - (4) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S004.
  - (5) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S005.
  - (6) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S006.

(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 MSOP [326 IAC 2-6.1]**

Pursuant to 326 IAC 2-6.1 and Air-014-NPD, as revised on March 9, 1999, any change that would increase the emissions from the rigid polyurethane foam production lines such that the potential to emit VOC of the entire source is greater than the Part 70 thresholds requires prior approval from IDEM.

#### **D.1.2 VOC Limit [326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements)]**

Any change or modification to the ten (10) rigid polyurethane foam production lines consisting of four (4) production lines identified as A4, A5, A6, and A9 insulating refrigerator cabinets and cooling units; five (5) production lines identified as AD1, AD2, AD3, AD4, and AD5 insulating refrigerator fresh food and freezer doors; and one (1) service area line, that would increase the potential to emit of VOC to greater than twenty-five (25) tons per year each, must obtain approval from IDEM, OAQ.

### **Compliance Determination Requirements**

#### **D.1.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] [326 IAC 8-1-6]**

In order to demonstrate compliance status with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC emission rate testing of production line A4 or A5, within 60 days after achieving the maximum capacity, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Dometic LLC  
Source Address: 2310 Industrial Parkway, Elkhart, Indiana 46516  
Mailing Address: 2310 Industrial Parkway, Elkhart, Indiana 46516  
MSOP No.: M039-28368-00699

**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 AND ENFORCEMENT 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>	Dometic LLC
<b>Address:</b>	2310 Industrial Parkway
<b>City:</b>	Elkhart, Indiana 46516
<b>Phone #:</b>	(574)294-2511
<b>MSOP #:</b>	M039-28368-00699

I hereby certify that Dometic LLC is :

still in operation.

no longer in operation.

I hereby certify that Dometic LLC is :

in compliance with the requirements of MSOP M039-28368-00699.

not in compliance with the requirements of MSOP M039-28368-00699.

<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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Mail to: Permit Administration & Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Dometic LLC  
2310 Industrial Parkway  
Elkhart, Indiana 46516

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Dometic LLC 2310 Industrial Parkway, Elkhart, Indiana 46516, completed construction of the polyurethane production and manufacture refrigeration units for recreational vehicle industry operation on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 21, 2009 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M039-28368-00699, Plant ID No. 039-00699 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

# Indiana Department of Environmental Management Office of Air Quality

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

### Source Description and Location

<b>Source Name:</b>	<b>Dometic LLC</b>
<b>Source Location:</b>	<b>2310 Industrial Parkway, Elkhart, IN 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3630</b>
<b>MSOP Permit No.:</b>	<b>M039-28368-00699</b>
<b>Permit Reviewer:</b>	<b>Swarna Prabha</b>

On August 21, 2009, the Office of Air Quality (OAQ) has received an application from Dometic LLC. related to the construction and operation of a new plant relating to the production of rigid polyurethane foam for insulating refrigeration equipments for the recreational vehicle industry.

### Existing Approvals

There have been no previous approvals issued to this source.

### Enforcement Issues

There are no pending enforcement actions related to this source.

### Emission Calculations

Emission calculations were provided by Dometic LLC. in electronic format on August 25, 2009. The emission calculations were verified by IDEM, OAQ as correct and accurate. See Appendix A of this document for detailed emission calculations.

### 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. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for

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

- (b) **PM2.5**  
Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 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 PM10 emissions as a surrogate for PM2.5 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 other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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 Dometic LLC., on August 21, 2009, relating to the production of rigid polyurethane foam for insulating refrigeration equipment for the recreational vehicle industry. Rigid polyurethane foam is applied as insulation inside refrigerator components including fresh food doors, freezer doors, cabinets and cooling units. The source has four (4) production lines for insulating cabinets and cooling units, five (5) door foaming areas for insulating fresh food and freezer doors, and one (1) service area line. The rigid polyurethane foam is created by mixing three (3) components: Diphenylmethane-diisocyanate (PMDI), Polyol, and Cyclopentane. Polyol and Cyclopentane are preblended in one (1) sealed blending station to form a mixture containing 10% cyclopentane, before being pumped to one (1) of three (3) 65 gallon day tanks, which then supplies the material to one of three metering units depending on the production line needs. The metering units supply a regulated volume of polyol/cyclopentane mixture and PMDI to mix heads in each of the production line. The emissions from the blending station and metering units are exhausted to vents Blend1, A45, A69, and AD12345.

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

- (a) **Foam Insulation Operations:**
- (1) Metering unit one, supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A4 and A5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum rate of 31.3 units per hour each and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A4a, A4b and A5a, A5b respectively.
  - (2) Metering unit two, supplying two (2) production lines for insulating refrigerator cabinets and cooling units, identified as emission units A6 and A9, approved for construction in 2009, utilizing flow coating insulate paper, plastic and metal components at a maximum rate of 18.8 and 5.6 units per hour respectively, and 14.7 pound of polyurethane foam per unit, uncontrolled and exhausting to two (2) vents each A6a, A6b, and A9a, A9b respectively.
  - (3) Metering unit three, supplying five (5) door foaming lines for insulating refrigerator fresh food and freezer doors, identified as emission units AD1, AD2, AD3, AD4, and AD5, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum 40 units per hour each and 4.0 pound of polyurethane foam per unit, with emissions uncontrolled and exhausting to vents AD1, AD2, AD3, AD4, and

AD5 respectively.

- (4) Metering unit three, supplying one (1) service area line for insulating refrigerator cooling units, identified as emission unit service area, approved for construction in 2009, utilizing flow coating to insulate paper, plastic and metal components at a maximum six (6) units per hour and 2.8 pounds of polyurethane foam per unit, with emissions uncontrolled and exhausting to vent service area.

NOTE: VOC emissions are generated during the foaming process when the polyurethane foam components react to form the foam within parts being insulated, cyclopentane is used as a blowing agent in the manufacture of polyurethane, and 5% cyclopentane is emitted based on the studies done at Cannon USA and others. The supporting data is provided by the Permittee.

(b) Storage Tanks:

- (1) One (1) underground cyclopentane storage tank, identified as T001, with a maximum storage capacity of 9,200 gallons, maximum yearly throughput of 38,100 gallons per year, uncontrolled and venting to the atmosphere.

NOTE: Emissions are negligible from the cyclopentane tank because the tank is an underground tank.

- (2) Two (2) indoor aboveground Diphenylmethane - diisocyanate (PMDI) storage tanks, collectively identified as T002, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, maximum yearly throughput of 228,000 gallons per year, uncontrolled and venting to the atmosphere.
- (3) Two (2) indoor aboveground Polyol storage tanks, collectively identified as T003, approved for construction in 2009, with a combined maximum storage capacity of 10,000 gallons, with a negligible emissions of volatile organic compounds, maximum combined yearly throughput of 180,950.00 gallons per year, uncontrolled and venting to the atmosphere.

NOTE: Negligible emissions are generated by the storage or the use of Polyol because the material has a very low vapor pressure and is considered to be non-volatile.

(c) Natural Gas-fired space heaters:

- (1) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 8.0 MMBtu/hr, exhausting outside through vent S001.
- (2) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.5 MMBtu/hr, exhausting outside through vent S002.
- (3) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 2.18 MMBtu/hr, exhausting outside through vent S003.
- (4) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S004.
- (5) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S005.
- (6) One (1) natural gas-fired Air Handler, approved for construction in 2009, rated at 0.4 MMBtu/hr, exhausting outside through vent S006.

**PTE of the Entire Source After Issuance of the MSOP**

The following table reflects the unrestricted emissions of the entire source before controls as listed in Appendix A. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit (tons/year)								
	**PM	*PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Total HAPs	Worst Single HAP
Foam Insulation Operation (3) Metering Lines including service area	0.0	0.0	0.0	0.0	25.74	0.0	0.0	0.0	0.0
PMDI Storage Tanks- T002	0.0	0.0	0.0	0.0	0.022	0.0	0.0	0.022	0.022 (diisocynate)
Natural gas combustion units - Air Handlers	0.12	0.46	0.46	0.04	0.33	5.11	5.53	0.115	0.10 (Hexane)
<b>Total PTE of Entire Source</b>	<b>0.12</b>	<b>0.46</b>	<b>0.46</b>	<b>0.04</b>	<b>26.10</b>	<b>5.11</b>	<b>5.53</b>	<b>0.137</b>	<b>0.022 (diisocynate)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * 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". US EPA has directed states to regulate PM <sub>10</sub> emissions as surrogate for PM <sub>2.5</sub> emissions.  ** The PTE of PM is less than 250 tons/yr, therefore there is no need to specify the limits. There is no emission factor for PM <sub>2.5</sub> in AP42, PM <sub>10</sub> = PM <sub>2.5</sub>									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are each less than twenty-five (25) tons per year, but VOC is greater than or equal to twenty-five (25) tons per year and less than 100 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.
- (d) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

- (a) 40 CFR Part 60.110, Subpart K - Standards for Volatile Organic Liquid Storage Vessels

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb (326 IAC 12), are not included in the permit, since the two (2) indoor aboveground organic storage tanks (T002) for Diphenylmethane-diisocyanate, have a maximum capacity of 5,000 gallons each, which is less than the 19,812.9 gallons minimum specified in the rule.

- (b) 40 CFR Part 60.110, Subpart Ka - Standards for Volatile Organic Liquid Storage Vessels

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels Subpart K—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 § 60.110 is not applicable to the two (2) indoor aboveground organic storage tanks (T002) for Diphenylmethane - diisocyanate because it will be constructed after May 19, 1978.

- (c) This requirements of 326 IAC 12 or 40 CFR 60, Subpart FFF, Standards of Performance for the Flexible Vinyl and Urethane Coating and Printing are not included in the permit, because this source does not conduct rotogravure printing or have facilities controlled by a solvent recovery emission control device.

- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

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

- (a) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for 40 CFR 63 Subpart M (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Fabrication Operation) because the source is not a major source for HAPs and does not produce flexible polyurethane foam and does not operate a flame lamination affected source or a loop slitter affected source.

- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for 40 CFR 63.11414 Subpart O (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources) because the source does not produce flexible polyurethane foam but rather rigid polyurethane foam.

- (c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production), 40 CFR 63. (1290-1309) Subpart III (326 IAC 20-22-1) because the source does not produce flexible polyurethane foam but rather a rigid polyurethane foam and is not a major source for HAPs.

- (d) This source is not subject to the requirements 40 CFR 63 Subpart PPP (National Emission Standards for Hazardous Air Pollutants for Polyether Polyols production) because the source does not produce Polyether Polyols.

- (e) This source is not subject to the requirements 40 CFR 63 Subpart T (National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning) because the source is not equipped with a cleaning machine.

- (g) 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)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 Determination</b>
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The following state rules are applicable to the source:

#### 326 IAC 2-6.1 (MSOP)

Pursuant to 326 IAC 2-6.1 (MSOP), the emission factor used to calculate the potential to emit VOC is based on documents (Cannon USA and Dow) submitted by the Permittee. Since VOC emission factor (5% release rate of VOC from blowing agent cyclopentane) during the production and application of polyurethane insulation could not be verified by IDEM, OAQ Compliance Data Section, IDEM has included the condition in the permit and has required the Permittee to complete compliance tests for VOC within 180 days of startup.

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

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

The potential to emit each individual hazardous air pollutant (HAP) is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year. Therefore, 326 IAC 2-4.1 does not apply.

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

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

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

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

Pursuant to 326 IAC 2-6-1, this source is not subject to 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 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

#### State Rule Applicability - Foam Insulation operation

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

This rule applies to facilities constructed after January 1980, which have potential VOC emissions of 25 tons or more per year, and are not regulated by any other provisions of 326 IAC 8. VOC emissions from each of the ten (10) production lines (A4, A5, A6, A9, AD1 through AD5, and service area) are less than 25 tons per year, therefore the requirements of 326 IAC 8-1-6 are not applicable.

NOTE: Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) any change or modification that would increase the VOC emissions from the polyurethane foam production and insulation operation, individual storage of raw materials, blending of polyol and cyclopentane, the ten (10) production lines that would increase the potential to emit of VOC to greater than twenty-five (25) tons per year each must obtain approval from IDEM, OAQ.

326 IAC 8-2-1 ( Surface coating emission limitations)

Pursuant to 326 IAC 8-2-1, the source is not subject to this rule, because this source does not perform surface coating of any type, produces rigid polyurethane foam insulation for recreational vehicle refrigerator parts.

326 IAC 8-2-7 (Large Appliance Coating Operations)

Pursuant to 326 IAC 8-2-7, the source is not subject to this rule, because this applies to facilities only if 326 IAC 8-2-1 applies.

326 IAC 8-2-9 (Miscellaneous metal coating operations)

This rule is applicable to the surface coating of metal parts. Pursuant to 326 IAC 8-2-9, the source is not subject to this rule because this source does not perform surface coating as defined in 326 IAC 8-1-0.5(c). Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

State Rule Applicability - Natural Gas space heaters- Air Handlers

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired space heaters, units are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the source-wide space heaters are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they have the combined potential to emit particulate matter less than 0.551 pounds per hour.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The space heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

**Compliance Determination, Monitoring and Testing Requirements**

In accordance with Air-014-NPD, as revised on March 9, 1999, the source will be required to perform compliance testing for VOC emissions for the ten (10) rigid polyurethane foam production lines, within 180 days of startup (beginning normal operations). This test is necessary because the emission factor used to calculate VOC emissions from the blowing agent is not approved by U.S. EPA or IDEM, OAQ. The overall emissions from each of the individual production lines, A4, A5, A6, A9, AD1 through AD5, and service area must be less than 25 tons per year, and the overall emissions of pre-control VOC shall not exceed more than one hundred (100) tons per year for this source to be permitted as an MSOP source.

NOTE: Since all ten (10) the production lines will not be constructed or in operation within 180-days from startup, Dometic will perform compliance testing on the production line that has the highest anticipated VOC emission rate based on the following factors: the quantity of rigid polyurethane foam produced per hour and the amount of foam surface area exposed to the atmosphere during production. Based on these factors Dometic has identified, the production lines A4 or A5, insulating refrigerator cabinets and cooling units, projected to have the greatest amount of surface area exposed to the atmosphere during production, will be constructed within 180 days.

### 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 August 21, 2009, and additional information was received on September 9, 2009, and September 14, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and MSOP No. 039-28368-00699. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha 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) 234-5376 or toll free at 1-800-451-6027 extension 4-5376.
- (b) A copy of the findings is available on the Internet at: [www.in.gov/idem/ai/appfiles/idem-caats/](http://www.in.gov/idem/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/)

Uncontrolled Potential Emissions (tons/year)					
Category	Emissions Generating Activity				
Criteria Pollutants	Pollutant	Foam Insulation lines; A4, A5, A6, A9, AD1, AD2, Ad3, AD4, AD5 and service area	PMDI Storage Tanks T002	Natural Gas	TOTAL
				Combustion	
				units- Air Handlers	
	PM	0.00	0.0	0.12	0.12
	PM10	0.00	0.0	0.46	0.46
	PM2.5	0.00	0.0	0.46	0.46
	SO2	0.00	0.0	0.04	0.04
	NOx	0.00	0.0	5.53	5.53
	VOC	25.74	0.022	0.33	26.10
	CO	0.00	0.0	5.11	5.11
Hazardous Air Pollutants	1,3-Butadiene	0.00	0.00	0.00	0.00E+00
	Acetaldehyde	0.00	0.00	0.00	0.00E+00
	Xylenes	0.00	0.00	0.00	0.00E+00
	Toluene	0.00	0.00	2.07E-04	2.07E-04
	Ethyl Benzene	0.00	0.00	0.00	0.00E+00
	Benzene	0.00	0.00	1.28E-04	1.28E-04
	Diphenylmethane-diisocyanate	0.00	0.022	0.00	2.19E-02
	Glycol Ethers	0.00	0.00	0.00	0.00E+00
	Hexane	0.00	0.00	1.09E-01	1.09E-01
	Formaldehyde	0.00	0.00	4.56E-03	4.56E-03
	Chromium	0.00	0.00	8.51E-05	8.51E-05
	Nickel	0.00	0.00	1.28E-04	1.28E-04
	<b>Totals</b>	0.00E+00	2.19E-02	0.115	0.136

Controlled Potential Emissions (tons/year)					
Category	Emissions Generating Activity				
Criteria Pollutants	Pollutant	Foam Insulation lines; A4, A5, A6, A9, AD1, AD2, Ad3, AD4, AD5 and service area	PMDI Storage Tanks T002	Natural Gas	TOTAL
				Combustion	
				units- Air Handlers	
	PM	0.00	0.00	0.12	0.12
	PM10	0.00	0.00	0.46	0.46
	PM2.5	0.00	0.00	0.46	0.46
	SO2	0.0	0.0	0.04	0.04
	NOx	0.0	0.0	5.53	5.53
	VOC	25.74	0.022	0.33	26.1
	CO	0.0	0.0	5.11	5.11
Hazardous Air Pollutants	1,3-Butadiene	0.00	0.00	0.00	0.00E+00
	Acetaldehyde	0.00	0.00	0.00	0.00E+00
	Xylenes	0.00	0.00	0.00	0.00E+00
	Toluene	0.00	0.00	2.07E-04	2.07E-04
	Ethyl Benzene	0.00	0.00	0.00	0.00E+00
	Benzene	0.00	0.00	1.28E-04	1.28E-04
	Diphenylmethane-diisocyanate	0.00	0.02	0.00	2.19E-02
	Glycol Ethers	0.00	0.00	0.00	0.00E+00
	Hexane	0.00	0.00	1.09E-01	1.09E-01
	Formaldehyde	0.00	0.00	4.56E-03	4.56E-03
	Chromium	0.00	0.00	8.51E-05	8.51E-05
	Nickel	0.00	0.00	1.28E-04	1.28E-04
	<b>Totals</b>	0.00	0.02	0.115	0.136

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

NOTES:

- On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC2-2, to include those requirements. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has
- There are no emission factors in AP42 for PM2.5, PM10 = PM2.5
- The VOC emissions from each of the metering lines and service area are less than 25 tons per year each.

**Appendix A: Emissions Calculations  
VOCs, HAPs  
VOC emissions from Foam insulation operation**

Company Name: Dometic LLC  
Address City IN Zip: 2310 Industrial Parkway, Elkhart, Indiana  
Permit Number: 039-28368-00699  
Reviewer: Swarna Prabha

Unit ID	Line	Maximum Production Rate (units/hour)	Foam Used per Unit (lbs/unit)	Foam Usage (lbs/hour)	Potential Foam Usage (lbs/year)	Percentage of Blowing Agent in Foam (% by weight)	VOC Release Rate (%) <sup>1</sup>	VOC Content % of Blowing Agent	Potential VOC Emissions (lbs/hour) <sup>2</sup>	Actual VOC Emissions (lbs/day) <sup>3</sup>	Potential VOC Emissions (lbs/day) <sup>4</sup>	Potential VOC Emissions (lbs/year) <sup>2</sup>	Potential VOC Emissions (tons/year) <sup>2</sup>	Anticipated Actual VOC Emissions (ton/yr) <sup>2</sup>
<b>Metering Unit 1</b>														
A4	cabinets and cooling units	31.3	14.7	458.8	4,019,345.2	5.60	5.00	100.00	1.28	10.28	30.83	11,254.17	5.63	1.28
A5	cabinets and cooling units	31.3	14.7	458.8	4,019,345.2	5.60	5.00	100.00	1.28	10.28	30.83	11,254.17	5.63	1.28
<b>Metering Unit 2</b>														
A6	cabinets and cooling units	18.8	14.7	275.3	2,411,607.1	5.60	5.00	100.00	0.77	6.17	18.50	6,752.50	3.38	0.77
A9	cabinets and cooling units	5.6	14.7	82.6	723,482.1	5.60	5.00	100.00	0.23	1.85	5.55	2,025.75	1.01	0.23
<b>Metering Unit 3</b>														
AD1	Door Foaming Station AD1	40.0	4.0	161.4	1,413,650.8	5.60	5.00	100.00	0.45	3.61	10.84	3,958.22	1.98	0.45
AD2	Door Foaming Station AD2	40.0	4.0	161.4	1,413,650.8	5.60	5.00	100.00	0.45	3.61	10.84	3,958.22	1.98	0.45
AD3	Door Foaming Station AD3	40.0	4.0	161.4	1,413,650.8	5.60	5.00	100.00	0.45	3.61	10.84	3,958.22	1.98	0.45
AD4	Door Foaming Station AD4	40.0	4.0	161.4	1,413,650.8	5.60	5.00	100.00	0.45	3.61	10.84	3,958.22	1.98	0.45
AD5	Door Foaming Station AD5	40.0	4.0	161.4	1,413,650.8	5.60	5.00	100.00	0.45	3.61	10.84	3,958.22	1.98	0.45
Service Area	Service Area	6.0	2.8	16.8	147,168.0	5.60	5.00	100.00	0.05	0.38	1.13	412.07	0.21	0.05
												<b>25.74</b>		
<b>Total</b>									<b>5.88</b>	<b>47.02</b>	<b>141.07</b>	<b>51,489.76</b>	<b>25.74</b>	<b>5.88</b>

During the flowcoating application of urethane, component A (isocyanate) and component B (polyols) are mixed together and the components react quickly to form urethane, with minimal emission of VOCs (Cyclopentane).

**Notes:**

Maximum production rate and foam usage per unit was supplied by Dometic LLC

<sup>1</sup> VOC release rate (5%) based on documentation provided by Cannon USA, and Dow. See Process Description.

<sup>2</sup>Potential emissions based on operating at maximum production rates for 8,760 hours per year. Anticipate actual emissions based on operating at maximum production rates for 2,000 hours per year.

<sup>3</sup> Actual emissions based on operating at a maximum production of 8 hrs per day.

<sup>4</sup> Potential emissions based on operating at a maximum production of 24 hrs per day.

Polyurethane foam mixture is comprised of the following materials:

PMDI (%)	Polyol (%)	Cyclopentane (%)	Total (%)
55.7	38.7	5.6	100

**Example Calculations**

Potential VOC Emissions from Production Line A5

31.3 units/hour \* 14.7 lbs of foam/unit \* 5.6% Blowing Agent/100 \* 5% VOC Release Rate/100 \* 1 ton/2,000 lbs \* 8,760 hour/year= 5.63 tons of VOC/year

[Maximum Units/hr]\*[maximum usgae rate (lbs/unit)]\*[%blowing agent]\*[%VOC]

Maximum Usage Rate (gal/hr) = [Maximum Usage Rate (lbs/hr)] / [Material Density (lbs/gal)]

Maximum Usage Rate (gal/yr) = [Maximum Usage Rate (gal/hr)] [8760 hrs/yr]

VOC fraction by weight = [VOC Content (lbs/gal)] / [Material Density (lbs/gal)]

PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] \* [VOC fraction by weight]

PTE of VOC (lbs/yr) = [PTE of VOC (lbs/hr)] \* [8760 hrs/yr]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/yr)] \* [1 ton/2000 lbs]

**Anticipate Actual VOC Emissions from Production Line A5**

31.3 units/hour \* 14.7 lbs of foam/unit \* 5.6% Blowing Agent/100 \* 5% VOC Release Rate/100 \* 1 ton/2,000 lbs \* 2,000 hour/year= 1.28 tons of VOC/year

**Appendix A: Emissions Calculations**  
**PMDI #1 - Vertical Fixed Roof Tanks- T002**

**Company Name: Dometic LLC**  
**Address City IN Zip: 2310 Industrial Parkway, Elkhart, Indiana**  
**Permit Number: 039-28368-00699**  
**Reviewer: Swarna Prabha**

**Tank Dimensions**

Shell Length (ft):	13.83
Diameter (ft):	9
Volume (gallons):	5,000.00
Turnovers:	22.79
Net Throughput(gal/yr):	113,950.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	Red/Primer
Shell Condition	Good

**Breather Vent Settings**

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Fort Wayne, Indiana (Avg Atmospheric Pressure = 14.31 psia)

Mixture/Component	Month	Daily Liquid Surface Temperature (deg F)			Liquid Bulk Temp	Vapor Pressure (psia)			Vapor Mol.	Molecular Weight	Basis for Vapor Pressure
		Avg.	Min.	Max.		Avg.	Min.	Max.			
Diphenylmethane-diisocyanate	All	60.92	49.88	71.95	54.23	0.0145	0.0145	0.0145	370	87.5	Option 1: VP60 = .0065 VP70 = .009

Components	VOC Losses (lbs/year)			Total Emissions
	Working Loss	Breathing Loss	Total Emissions	tons/yr
Diphenylmethane-diisocyanate-Tanks T002*	29.12	14.72	43.84	0.022

\* There are two tanks of PMDI - storage capacity of 5,000 gallon each.

**Appendix A: Emissions Calculations**

**VOCs, Particulate, HAPs**

**Natural Gas Combustion**

**MM BTU/HR <100**

Company Name: Dometic LLC  
 Address City IN Zip: 2310 Industrial Parkway, Elkhart, Indiana  
 Permit Number: 039-28368-00699  
 Reviewer: Swarna Prabha

Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Lo Nox Emission Factor (lb/MMCF)				50		

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission					
					tons/year	tons/year	tons/year	tons/year	tons/year	tons/year
					PM*	PM10*	SO2	NOx**	VOC	CO
Rapid Air Handler	1	8.000	8.000	70.08	0.067	0.27	0.021	3.5	0.193	2.9
ICE Air Handler -H001	1	2.500	2.500	21.90	0.021	0.08	0.007	0.5	0.060	0.9
ICE Air Handler-H002	1	2.179	2.179	19.08	0.018	0.07	0.006	1.0	0.052	0.8
Rapid Air Handler-H003	1	0.400	0.400	3.50	0.003	0.01	0.001	0.2	0.010	0.1
Rapid Air Handler -H004	1	0.400	0.400	3.50	0.003	0.01	0.001	0.175	0.010	0.1
Rapid Air Handler- H005	1	0.400	0.400	3.50	0.003	0.01	0.001	0.2	0.010	0.1
<b>Totals</b>	<b>6</b>		<b>13.879</b>	<b>121.6</b>	<b>0.12</b>	<b>0.46</b>	<b>0.036</b>	<b>5.53</b>	<b>0.33</b>	<b>5.11</b>

Pollutant	Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Emission Factor (lb/MMCF)	2.1E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	2.1E-03

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission						
					tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
					Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Rapid Air Handler	1	8.000	8.000	70.08	7.4E-05	2.6E-03	6.3E-02	1.2E-04	3.9E-05	4.9E-05	7.4E-05
ICE Air Handler -H001	1	2.500	2.500	21.90	2.3E-05	8.2E-04	2.0E-02	3.7E-05	1.2E-05	1.5E-05	2.3E-05
ICE Air Handler-H002	1	2.179	2.179	19.08	2.0E-05	7.2E-04	1.7E-02	3.2E-05	1.0E-05	1.3E-05	2.0E-05
Rapid Air Handler-H003	1	0.400	0.400	3.50	3.7E-06	1.3E-04	3.2E-03	6.0E-06	1.9E-06	2.5E-06	3.7E-06
Rapid Air Handler -H004	1	0.400	0.400	3.50	3.7E-06	1.3E-04	3.2E-03	6.0E-06	1.9E-06	2.5E-06	3.7E-06
Rapid Air Handler- H005	1	0.400	0.400	3.50	3.7E-06	1.3E-04	3.2E-03	6.0E-06	1.9E-06	2.5E-06	3.7E-06
<b>Totals</b>	<b>6</b>		<b>13.879</b>	<b>121.576</b>	<b>0.00013</b>	<b>0.00456</b>	<b>0.10942</b>	<b>0.00021</b>	<b>0.00007</b>	<b>0.00009</b>	<b>0.00013</b>

- \*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
- There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5
- \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
- The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) \* 8,760 hrs/yr \* 1 MMCF/1,000 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) / 2,000 lb/ton  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
 All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

**Abbreviations**

PM = Particulate Matter	NOx = Nitrous Oxides	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC - Volatile Organic Compounds	Ni = Nickel
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium



# 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)

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Dwight Miller  
Dometic LLC  
2310 Industrial Parkway  
Elkhart, IN 46516

**DATE:** November 20, 2009

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
MSOP  
039-28368-00699

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 11/20/2009 Dometic LLC 039-28368-00699 (Final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dwight Miller Dometic LLC 2310 Industrial Parkway Elkhart IN 46516 (Source CAATS) (CONFIRM DELIVERY)										
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Richard & Lori Frame 3521 Superior Street Elkhart IN 46516 (Affected Party)										
8		Beulah F Gibson 3525 Superior Street Elkhart IN 46516 (Affected Party)										
9		Corey W Hausback 3501 Superior Street Elkhart IN 46516 (Affected Party)										
10		Ralph P. & Tara L. James 3421 Superior Street Elkhart IN 46516 (Affected Party)										
11		Corey Johnson & Bridgit Kerns 3547 Superior Street Elkhart IN 46516 (Affected Party)										
12		Donna H Kress 3531 Industrial Parkway Elkhart IN 46516 (Affected Party)										
13		Ida C Krus 2221 Industrial Parkway Elkhart IN 46516 (Affected Party)										
14		Dianne N Masini 3427 Superior Street Elkhart IN 46516 (Affected Party)										
15		Robert D & Debra Mason 3427 Superior Street Elkhart IN 46516 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Curtis P 3435 Superior Street Elkhart IN 46516 (Affected Party)									
2		Manlio Morales 3435 Superior Street Elkhart IN 46516 (Affected Party)									
3		National Supply LLC 220 Industrial Parkway Elkhart IN 46516 (Affected Party)									
4		Reglein Real Estate, Inc. 2201 Industrial Parkway Elkhart IN 46516 (Affected Party)									
5		The Selmer Company, Inc. 2415 Industrial Parkway Elkhart IN 46516 (Affected Party)									
6		Triple T Properties, Inc. 2520 Industrial Parkway Elkhart IN 46516 (Affected Party)									
7		Richard K & Janet A Truex 3543 Superior Street Elkhart IN 46516 (Affected Party)									
8		Roger D Wine 3539 Superior Street Elkhart IN 46516 (Affected Party)									
9		Pennsylvania Lines, LLC R/W Thru NW 1/4 SEC 2-37-5 Elkhart IN 46516 (Affected Party)									
10											
11											
12											
13											
14											
15											

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