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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: Jan. 29, 2010

RE: Atwood Mobile Products / 039-28841-00701

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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
FN-REGIS.dot 1/2/08

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REGISTRATION
OFFICE OF AIR QUALITY

Atwood Mobile Products, LLC
57912 Charlotte Ave.
Elkhart, Indiana 46517

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 039-28841-00701	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Jan. 29, 2010

SECTION A SOURCE SUMMARY

This registration 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 Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a new stationary aluminum and steel fabrication plant.

Source Address:	57912 Charlotte Ave., Elkhart, IN 46517
Mailing Address:	57912 Charlotte Ave., Elkhart, IN 46517
General Source Phone Number:	(574) 266-4813
SIC Code:	3499
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One e-coat operation, identified as e-coat, approved for construction in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) alkaline cleaner tank, identified as Tank 1, equipped with a natural gas-fired burner, identified as 01j, rated at 2.35 million British thermal units per hour and exhausting to stacks S12 and S13.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) treatment (ammonium hydroxide) tank, identified as Tank 3.

(D) One (1) rinse tank, using tap water, identified as Tank 4

(E) One (1) rinse tank, using deionized water, identified as Tank 5.

(2) One (1) paint system, consisting of:

(A) One (1) paint dip tank, used to apply surface coating to metal parts and using 6,674 gallons of coating per year, using no control devices, and exhausting to exhaust blower V16.

(B) Two (2) rinse tanks, identified as Tank 2 and Tank 3.

(3) One (1) cure oven, equipped with a natural gas-fired burner, identified as 01i, rated at 3.85 million British thermal units per hour and exhausting to stack S11.

(b) One powder coat operation, identified as powder coating line, constructed in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) degreaser tank, identified as Tank 1, with a capacity of approximately 1,900-gallons, equipped with a natural gas-fired burner, identified as 01c, rated at 2.75 million British thermal units per hour and exhausting to stack S4.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) phosphate tank, identified as Tank 3, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01d, rated at 1.75 million British thermal units per hour and exhausting to stack S5.

(D) One (1) rinse tank, using tap water, identified as Tank 4.

(E) One (1) phosphate rinse tank, using low concentration phosphate, identified as Tank 5, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01e, rated at 1.75 million British thermal units per hour and exhausting to stack S6.

(2) One (1) dry-off oven, firing natural gas, identified as 01b, rated at 2.5 million British thermal units per hour and exhausting to stack S3.

(3) One (1) electrostatic powder coat booth, using twelve (12) automatic and two (2) manual spray guns, used to apply surface coating to metal parts and using 29,000 pounds of coating per year, using no control devices, and exhausting inside the building.

(4) One (1) cure oven, firing natural gas, identified as 01a, rated at 3.5 million British thermal units per hour and exhausting to stacks S1 and S2.

(5) One (1) burn off oven utilizing two (2) burners, firing natural gas, identified as 01g, each rated at 0.15 million British thermal units per hour and exhausting stack S7.

(6) One (1) powder coat booth room furnace natural gas-fired burner, identified as 01f, rated at 2.5 million British thermal units per hour used to stabilize humidity and temperature for the booth.

(c) One (1) Three Stage Parts Washer constructed in 2010, equipped with two (2) burners, firing natural gas, identified as 01h, each rated at 2.0 million British thermal units per hour and exhausting stacks S8, S9, and S10.

(1) Stage 1 using 4,302 gallons per year of Compound SC-RP-6 Cleaner at 120 degrees F.

(2) Stage 2 using 103 gallons per year of Solvol Additive at 120 degrees F.

(3) Stage 3 using 8,604 gallons per year of Compound RP-111 Rust Inhibitor at 90 degrees F.

(d) One (1) rust inhibitor dip tank, constructed in 2010, used to apply rust prevention to metal parts and using 365 gallons of coating (Compound A-97P Rust Preventative) per year, using no control devices, and exhausting inside the building.

(e) Welding operations, identified as 04, constructed in 2010, using no control devices and consisting of the following:

(1) Eighteen (18) (MIG) stations, with a maximum consumption rate of 0.57 pounds of electrode per hour, each, with no control device and exhausting indoors.

(2) One (1) Tungsten Inert Gas (TIG) welder with a maximum consumption rate of 0.03 pounds of electrodes per hour, with no control device and exhausting indoors.

(f) One (1) Laser Cutter, identified as 05, constructed in 2010, with a maximum cutting rate of 150 inches of 0.25 inch thick steel, using a baghouse for control and exhausting to Stack S27.

(g) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Air make-up Powder Coat Dept furnace natural gas-fired burner, identified as 02a, rated at 2.5 million British thermal units per hour.

(2) One (1) Air Make-Up, E-Coat Dept furnace natural gas-fired burner, identified as 02b, rated at 3.025 million British thermal units per hour.

(3) One (1) Air Make-Up, Chair Dept furnace natural gas-fired burner, identified as 02c, rated at 2.5 million British thermal units per hour.

(4) One (1) Air Make-Up, RAK Dept furnace natural gas-fired burner, identified as 02d, rated at 1.75 million British thermal units per hour.

(5) One (1) Air Make-Up, Shippng furnace natural gas-fired burner, identified as 02e, rated at 3.9 million British thermal units per hour.

(6) One (1) Air Make-Up, Tool Room furnace natural gas-fired burner, identified as 02f, rated at 0.112 million British thermal units per hour.

(7) Four (4) furnaces natural gas-fired burner, identified as 02g through 02j, each rated at 0.40 million British thermal units per hour.

(8) One (1) HR Hall furnace natural gas-fired burner, identified as 02k, rated at 0.15 million British thermal units per hour.

(9) One (1) Front Offices furnace natural gas-fired burner, identified as 02l, rated at 0.107 million British thermal units per hour.

(10) Seven (7) Radiant Tube Heaters natural gas-fired burner, identified as 02m, each rated at 0.125 million British thermal units per hour.

SECTION B GENERAL CONDITIONS

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

Terms in this registration 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 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration 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.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this registration.

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

(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 registration shall not require revocation of this registration.

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

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to Registration No. 039-28841-00701and 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

(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 registration.

(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.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

(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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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.3 General Record Keeping Requirements [326 IAC 2-5.5-4(b)]

(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.4 General Reporting Requirements [326 IAC 2-5.5-4(b)]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

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

SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.5-4(a)(2)]:

(a) One e-coat operation, e-coat, approved for construction in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) alkaline cleaner tank, identified as Tank 1, equipped with a natural gas-fired burner, identified as 01j, rated at 2.35 million British thermal units per hour and exhausting to stacks S12 and S13.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) treatment (ammonium hydroxide) tank, identified as Tank 3.

(D) One (1) rinse tank, using tap water, identified as Tank 4

(E) One (1) rinse tank, using deionized water, identified as Tank 5.

(2) One (1) paint system, consisting of:

(A) One (1) paint dip tank, used to apply surface coating to metal parts and using 6,674 gallons of coating per year, using no control devices, and exhausting to exhaust blower V16.

(B) Two (2) rinse tanks, identified as Tank 2 and Tank 3.

(3) One (1) cure oven, equipped with a natural gas-fired burner, identified as 01i, rated at 3.85 million British thermal units per hour and exhausting to stack S11.

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

Emission Limitations and Standards [326 IAC 2-5.5-4(a)(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5), pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.5-4(b)]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC

usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

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

SECTION D.2 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.5-4(a)(2)]:

(b) One powder coat operation, powder coating line, constructed in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) degreaser tank, identified as Tank 1, with a capacity of approximately 1,900-gallons, equipped with a natural gas-fired burner, identified as 01c, rated at 2.75 million British thermal units per hour and exhausting to stack S4.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) phosphate tank, identified as Tank 3, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01d, rated at 1.75 million British thermal units per hour and exhausting to stack S5.

(D) One (1) rinse tank, using tap water, identified as Tank 4.

(E) One (1) phosphate rinse tank, using low concentration phosphate, identified as Tank 5, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01e, rated at 1.75 million British thermal units per hour and exhausting to stack S6.

(2) One (1) dry-off oven, firing natural gas, identified as 01b, rated at 2.5 million British thermal units per hour and exhausting to stack S3.

(3) One (1) electrostatic powder coat booth, using twelve (12) automatic and two (2) manual spray guns, used to apply surface coating to metal parts and using 29,000 pounds of coating per year, using no control devices, and exhausting inside the building.

(4) One (1) cure oven, firing natural gas, identified as 01a, rated at 3.5 million British thermal units per hour and exhausting to stacks S1 and S2.

(5) One (1) burn off oven utilizing two (2) burners, firing natural gas, identified as 01g, each rated at 0.15 million British thermal units per hour and exhausting stack S7.

(6) One (1) powder coat booth room furnace natural gas-fired burner, identified as 01f, rated at 2.5 million British thermal units per hour used to stabilize humidity and temperature for the booth.

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

Emission Limitations and Standards [326 IAC 2-5.5-4(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the electrostatic powder coat booth shall not exceed 8.75 pounds per hour when operating at a process weight rate of 3.1 tons per hour.

The above pounds per hour limitations were calculated with the following equation:

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

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

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

D.2.2 VOC Limit [326 IAC 8-1-1(b)]

The One (1) degreaser tank, identified as Tank 1, shall use less than fifteen (15) pounds of VOC per day of cleaning solvent.

Compliance with this limit renders the provisions of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control) not applicable.

D.2.3 Incinerators [326 IAC 4-2-2]

The one (1) burn-off oven, identified as 01g, has a maximum solid waste capacity of less than 100 pounds per hour. Pursuant to 326 IAC 4-2, the burn-off oven shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and

(e) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

(f) If any requirements of (a) through (e) are not met, the source shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

D.2.4 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the source shall not operate the burn-off oven, identified as 01g, unless the waste gas stream is burned in one (1) of the following:

(a) Direct-flame afterburner; or

(b) Secondary chamber.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping Requirements [326 IAC 2-5.1-2(c)(4)]

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.2.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of and solvent used on a daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

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

D.2.7 Reporting Requirements

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

SECTION D.3 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.5-4(a)(2)]:

(c) One (1) Three Stage Parts Washer constructed in 2010, equipped with two (2) burners, firing natural gas, identified as 01h, each rated at 2.0 million British thermal units per hour and exhausting stacks S8, S9, and S10.

(1) Stage 1 using 4,302 gallons per year of Compound SC-RP-6 Cleaner at 120 degrees F.

(2) Stage 2 using 103 gallons per year of Solvol Additive at 120 degrees F.

(3) Stage 3 using 8,604 gallons per year of Compound RP-111 Rust Inhibitor at 90 degrees F.

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

Emission Limitations and Standards [326 IAC 2-5.5-4(a)(1)]

D.3.1 VOC Limit [326 IAC 8-1-1(b)]

The Three Stage Parts Washer shall use less than fifteen (15) pounds of VOC per day of cleaning solvent.

Compliance with this limit renders the provisions of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control) not applicable.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping Requirements [326 IAC 2-5.1-2(c)(4)]

D.3.3 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of and solvent used on a daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

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

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Registration
CERTIFICATION

Source Name: Atwood Mobile Products, LLC
Source Address: 57912 Charlotte Ave., Elkhart, IN 46517
Mailing Address: 57912 Charlotte Ave., Elkhart, IN 46517
Registration No.: 039-28841-00701

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

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Test Result (specify)

□ Report (specify)

□ Notification (specify)

□ Affidavit (specify)

□ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Compliance and Enforcement Branch
Office of Air Quality
Quarterly Report

Source Name: Atwood Mobile Products, LLC
Source Address: 57912 Charlotte Ave., Elkhart, IN 46517
Mailing Address: 57912 Charlotte Ave., Elkhart, IN 46517
Registration No.: 039-28841-00701
Facility: Degreaser tank, identified as Tank 1
Parameter: VOC
Limit: Fifteen (15) pounds per day

Month: _____ **Year:** _____

Day	Daily VOC Usage (lbs VOC)	Day	Daily VOC Usage (lbs VOC)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Compliance and Enforcement Branch
Office of Air Quality
Quarterly Report

Source Name: Atwood Mobile Products, LLC
Source Address: 57912 Charlotte Ave., Elkhart, IN 46517
Mailing Address: 57912 Charlotte Ave., Elkhart, IN 46517
Registration No.: 039-28841-00701
Facility: Three Stage Parts Washer
Parameter: VOC
Limit: Fifteen (15) pounds per day

Month: _____ **Year:** _____

Day	Daily VOC Usage (lbs VOC)	Day	Daily VOC Usage (lbs VOC)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

REGISTRATION
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Atwood Mobile Products, LLC
Address:	57912 Charlotte Ave.
City:	Elkhart, Indiana 46517
Phone Number:	**(**574) 266-4813
Registration No.:	039-28841-00701

I hereby certify that Atwood Mobile Products, LLC is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Atwood Mobile Products, LLC is :
- ☐ in compliance with the requirements of Registration No. 039-28841-00701.
- ☐ not in compliance with the requirements of Registration No. 039-28841-00701.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	**Atwood Mobile Products, LLC**
Source Location:	**57912 Charlotte Ave., Elkhart, IN 46517**
County:	**Elkhart**
SIC Code:	**3499**
Registration No.:	**039-28841-00701**
Permit Reviewer:	**Bruce Farrar**

On December 31, 2009, the Office of Air Quality (OAQ) received an application from Atwood Mobile Products, LLC related to the construction and operation of a new aluminum and steel fabrication plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]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, 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 pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Atwood Mobile Products, LLC on December 31, 2009, relating to the construction and operation of a new stationary aluminum and steel fabrication plant. The source has the potential to emit pollutants greater than five (5) tons per year, therefore requires a registration.

(a) One e-coat operation, identified as e-coat, approved for construction in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) alkaline cleaner tank, identified as Tank 1, equipped with a natural gas-fired burner, identified as 01j, rated at 2.35 million British thermal units per hour and exhausting to stacks S12 and S13.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) treatment (ammonium hydroxide) tank, identified as Tank 3.

(D) One (1) rinse tank, using tap water, identified as Tank 4

(E) One (1) rinse tank, using deionized water, identified as Tank 5.

(2) One (1) paint system, consisting of:

(A) One (1) paint dip tank, used to apply surface coating to metal parts and using 6,674 gallons of coating per year, using no control devices, and exhausting to exhaust blower V16.

(B) Two (2) rinse tanks, identified as Tank 2 and Tank 3.

(3) One (1) cure oven, equipped with a natural gas-fired burner, identified as 01i, rated at 3.85 million British thermal units per hour and exhausting to stack S11.

(b) One powder coat operation, identified as powder coating line, constructed in 2010, and consisting of:

(1) One (1) wash system consisting of:

(A) One (1) degreaser tank, identified as Tank 1, with a capacity of approximately 1,900-gallons, equipped with a natural gas-fired burner, identified as 01c, rated at 2.75 million British thermal units per hour and exhausting to stack S4.

(B) One (1) rinse tank, using tap water, identified as Tank 2.

(C) One (1) phosphate tank, identified as Tank 3, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01d, rated at 1.75 million British thermal units per hour and exhausting to stack S5.

(D) One (1) rinse tank, using tap water, identified as Tank 4.

(E) One (1) phosphate rinse tank, using low concentration phosphate, identified as Tank 5, with a capacity of approximately 1,200-gallons, equipped with a natural gas-fired burner, identified as 01e, rated at 1.75 million British thermal units per hour and exhausting to stack S6.

(2) One (1) dry-off oven, firing natural gas, identified as 01b, rated at 2.5 million British thermal units per hour and exhausting to stack S3.

(3) One (1) electrostatic powder coat booth, using twelve (12) automatic and two (2) manual spray guns, used to apply surface coating to metal parts and using 29,000 pounds of coating per year, using no control devices, and exhausting inside the building.

(4) One (1) cure oven, firing natural gas, identified as 01a, rated at 3.5 million British thermal units per hour and exhausting to stacks S1 and S2.

(5) One (1) burn off oven utilizing two (2) burners, firing natural gas, identified as 01g, each rated at 0.15 million British thermal units per hour and exhausting stack S7.

(6) One (1) powder coat booth room furnace natural gas-fired burner, identified as 01f, rated at 2.5 million British thermal units per hour used to stabilize humidity and temperature for the booth.

(c) One (1) Three Stage Parts Washer constructed in 2010, equipped with two (2) burners, firing natural gas, identified as 01h, each rated at 2.0 million British thermal units per hour and exhausting stacks S8, S9, and S10.

(1) Stage 1 using 4,302 gallons per year of Compound SC-RP-6 Cleaner at 120 degrees F.

(2) Stage 2 using 103 gallons per year of Solvol Additive at 120 degrees F.

(3) Stage 3 using 8,604 gallons per year of Compound RP-111 Rust Inhibitor at 90 degrees F.

(d) One (1) rust inhibitor dip tank, constructed in 2010, used to apply rust prevention to metal parts and using 365 gallons of coating (Compound A-97P Rust Preventative) per year, using no control devices, and exhausting inside the building.

(e) Welding operations, identified as 04, constructed in 2010, using no control devices and consisting of the following:

(1) Eighteen (18) (MIG) stations, with a maximum consumption rate of 0.57 pounds of electrode per hour, each, with no control device and exhausting indoors.

(2) One (1) Tungsten Inert Gas (TIG) welder with a maximum consumption rate of 0.03 pounds of electrodes per hour, with no control device and exhausting indoors.

(f) One (1) Laser Cutter, identified as 05, constructed in 2010, with a maximum cutting rate of 150 inches of 0.25 inch thick steel, using a baghouse for control and exhausting to Stack S27.

(g) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Air make-up Powder Coat Dept furnace natural gas-fired burner, identified as 02a, rated at 2.5 million British thermal units per hour.

(2) One (1) Air Make-Up, E-Coat Dept furnace natural gas-fired burner, identified as 02b, rated at 3.025 million British thermal units per hour.

(3) One (1) Air Make-Up, Chair Dept furnace natural gas-fired burner, identified as 02c, rated at 2.5 million British thermal units per hour.

(4) One (1) Air Make-Up, RAK Dept furnace natural gas-fired burner, identified as 02d, rated at 1.75 million British thermal units per hour.

(5) One (1) Air Make-Up, Shippng furnace natural gas-fired burner, identified as 02e, rated at 3.9 million British thermal units per hour.

(6) One (1) Air Make-Up, Tool Room furnace natural gas-fired burner, identified as 02f, rated at 0.112 million British thermal units per hour.

(7) Four (4) furnaces natural gas-fired burner, identified as 02g through 02j, each rated at 0.40 million British thermal units per hour.

(8) One (1) HR Hall furnace natural gas-fired burner, identified as 02k, rated at 0.15 million British thermal units per hour.

(9) One (1) Front Offices furnace natural gas-fired burner, identified as 02l, rated at 0.107 million British thermal units per hour.

(10) Seven (7) Radiant Tube Heaters natural gas-fired burner, identified as 02m, each rated at 0.125 million British thermal units per hour.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
E-Coat Operation	-	-	-	-	-	8.67	-	0.041	negl
Powder Coating Operation	2.76	2.76	2.76	-	-	0.27	-	-	-
Three Stage Parts Washer	-	-	-	-	-	5.05	-	-	-
Rust Prevention Operations	-	-	-	-	-	1.10	-	-	-
Welding/ Laser Cutting	0.29	0.29	0.29	-	-	-	-	.02	negl
Natural Gas Combustion	0.35	1.39	1.39	0.11	18.29	1.006	15.37	0.345	0.33 Hexane
Total PTE of Entire Source	**3.40**	**4.44**	**4.44**	**0.11**	**18.29**	**16.1**	**15.37**	**<25**	**<10**
Registration Levels	25	25	25	25	25	25	100	25	10

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 (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of pollutants are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.100b, Subpart Kb, are not included in the permit, because each tank is less than $75m^3$.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the permit, since this source does not use halogenated HAP solvents.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not a major source of HAPs.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.3880, Subpart HHHHHH (326 IAC 20-80), are not included in the permit, since this source does not: perform paint stripping, perform autobody refinishing, or perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

(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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit 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 2-4.1.

(c) 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.

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

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

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen

(15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

(f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

(g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

E-Coat Operation

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the e-coat operation is exempt from the requirements of 326 IAC 6-3-2 because it uses a dip coating.

(i) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The e-coat operation at this source performs the coating of metal parts under the SIC classification code 3499 and has actual VOC emissions greater than fifteen (15) pounds per day before add on controls. Therefore, this source is subject to this rule under 326 IAC 8-2-9(a)(5).

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere volatile organic compound (VOC) from application equipment of the e-coat operation in excess of 3.5 pounds of VOC per gallon, excluding water, for air dried or forced warm air dried coatings at temperatures up to 90 degrees Celsius.

Based on the MSDS submitted by the source, the VOC content of the coating delivered by the e-coat operation, the source can comply with the limit above.

The provisions of 326 IAC 8-2-9(f) do not apply, because the e-coat operation is a dip coating application and not a spray coating application.

Electrostatic Powder Coat Booth

(j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the electrostatic powder coat booth shall not exceed 8.75 pounds per hour when operating at a process weight rate of 3.1 tons per hour (144 chairs/hour X 43.06 lbs/chair = 6200 lbs/hr).

The pounds per hour limitations were calculated with the following equation:

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

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

(k) 326 IAC 8-2-6 (Metal Furniture Coating Operations)
326 IAC 8-2-6 does not apply to the powder coat operation, because the emission unit does not emit any VOCs.

Powder Coating Operation Tank 1

(l) 326 IAC 8-3-4 (Conveyorized Degreaser Operation)
Pursuant to 326 IAC 8-3-1, the provisions of 326 IAC 8-3-4 apply to the degreaser tank, identified as Tank 1, because it was constructed after January 1, 1980, uses organic solvent (Dipropylene glycol methyl ether) at a temperature below the boiling point of the solvent and uses a conveyorized system to move the articles through the solvent to spray an article for the purpose of cleaning or degreasing the article (326 IAC 81-2-21.5). However the source has agreed to limit VOC emissions to less than fifteen (15) pounds per day for the degreaser tank, identified as Tank 1. Compliance with this limit renders the provisions of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7(Conveyorized Degreaser Operation and Control) not applicable.

(1) The VOC usage for the degreaser tank, identified as Tank 1,shall be less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7(Conveyorized Degreaser Operation and Control) not applicable.

(2) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the degreaser tank, identified as Tank 1, each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the degreaser tank, identified as Tank 1:

(A) The amount and VOC content of solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.

(B) The total VOC usage for each day.

(3) Records of all required monitoring data, reports and support information required by this exemption 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

(4) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

Burn-Off Oven

(m) 326 IAC 4-2-2 (Incinerators)
The burn-off oven, identified as 01g, is subject to the requirements of 326 IAC 4-2-1 because it meets the definition of an incinerator provided in 326 IAC 1-2-34 and are not subject to any of the rules identified in 326 IAC 4-2-1(b)(2).

Pursuant to 326 IAC 4-2, the burn-off oven shall:

(1) Consist of primary and secondary chambers or the equivalent;

(2) Be equipped with a primary burner unless burning wood products;

(3) Comply with 326 IAC 5-1 and 326 IAC 2;

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and

(5) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

(6) If any requirements of (a) through (e) are not met, the source shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(n) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The burn-off oven, identified as 01g, is not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, this emission unit does not meet the definition of an indirect heating unit.

(o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The burn-off oven, identified as 01g, is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. The burn-off oven, identified as 01g, is not subject to the requirements of 326 IAC 6-3 because, pursuant to 326 IAC 6-3-1(b)(2), incinerators are exempt.

(p) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
The burn-off oven, identified as 01g, is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(q) 326 IAC 9-1-2 (Carbon Monoxide Emission Limits)
The burn-off oven, identified as 01g, is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2. However, the burn-off oven, identified as 01g, is subject to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits) because this unit is a stationary source of carbon monoxide constructed after March 21, 1972 and subject to the requirements of 326 IAC 9-1-2(a)(3).

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the Permittee shall not operate the burn-off oven, identified as 01g, unless the waste gas stream is burned in on the following:

(1) Direct-flame afterburner; or

(2) Secondary chamber.

Cure Ovens and Dry-off Oven

(r) The cure ovens, identified as 01a and 01i, and the dry-off oven, identified as 01b, are not subject to the requirements of 326 IAC 4-2-1 because they do not meet the definition of an incinerator provided in 326 IAC 1-2-34 and are not subject to any of the rules identified in 326 IAC 4-2-1(b)(2).

Three Stage Parts Washer

(s) 326 IAC 8-3-4 (Conveyorized Degreaser Operation)
Pursuant to 326 IAC 8-3-1, the provisions of 326 IAC 8-3-4 apply to the three stage parts washer because it was constructed after January 1, 1980, uses organic solvent at a temperature below the boiling point of the solvent and uses a conveyorized system to move the articles through the solvent to spray an article for the purpose of cleaning or degreasing the article (326 IAC 81-2-21.5). However the source has agreed to limit VOC emissions to less than fifteen (15) pounds per day for the three stage parts washer. Compliance with this limit renders the provisions of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7(Conveyorized Degreaser Operation and Control) not applicable. Therefore, the owner or operator of this source shall comply with the following:

(1) The VOC usage for the three stage parts washer shall be less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7(Conveyorized Degreaser Operation and Control) not applicable.

(2) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the three stage parts washer each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the three stage parts washer:

(A) The amount and VOC content of solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.

(B) The total VOC usage for each day.

(3) Records of all required monitoring data, reports and support information required by this exemption 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

(4) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

(t) 326 IAC 8-6 (Organic Solvent Emission Limitations)
The Three Stage Parts Washer is not subject to 326 IAC 8-6 because its potential VOC emissions are less than 100 tons per year and it is regulated by another provision of Article 8.

Rust Prevention Operation

(u) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the rust prevention operation is exempt from the requirements of 326 IAC 6-3-2 because it uses a dip coating.

(v) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The rust prevention operation at this source performs the coating of metal parts under the SIC classification code 3499 but has actual VOC emissions less than fifteen (15) pounds per day before add on controls (0.27lbs/hr * (6.04 lbs VOC/gal/6.88 lbs/gal) * 24 hrs/day = 5.68 lb VOC/day). Therefore, this source is not subject to this rule under 326 IAC 8-2-9(a)(5).

Welding Operation

(w) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14) 326 IAC 6-3-1(b) (7), the welding operation is exempt from the requirements of 326 IAC 6-3-2 because it uses less than 625 lbs of rod or wire/day.

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 December 31, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 039-28841-00701. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Bruce Farrar 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) 234-5401or toll free at 1-800-451-6027 extension 4-5401.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
Summary

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Uncontrolled Potential to Emit (tons/year)							
	E Coat	Powder Coating [a]	Rust Prevention	Three Stage Parts Washer	Welding Cutting	Combustion [b]	Total
PM	-	2.76	-	-	0.29	0.35	3.40
PM10	-	2.76	-	-	0.29	1.39	4.44
PM2.5	-	2.76	-	-	0.29	1.39	4.44
SO2	-	-	-	-	-	0.110	0.11
NOX	-	-	-	-	-	18.29	18.29
VOC	8.67	0.27	1.10	5.05	-	1.006	16.10
CO	-	-	-	-	-	15.37	15.37
total HAPs	0.041	-	-	-	0.02	0.345	0.41
Worst Case HAP	0.015	-	-	-	negl	0.320	<10
HAP name	Toulene					Hexane	

a. Assume PM =PM10 and PM2.5
b. Assume PM10 = PM2.5

Appendix A: Emissions Calculations
VOC and Particulate
From E-Coat Operations

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Avenue, Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Vectrocoat KMAA 175	8.8	30.11%	0.7%	29.4%	0.0%	69.89%	6674.00	2.60	2.60	8.67	0.00	3.72	100%

State Potential Emissions **Add worst case coating to all solvents** **8.67** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Permit Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Material	Density (Lb/Gal)	Gallons of Material (gal/year)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	
Vectrocoat KMAA 175	8.83	6674.00	0.05%	0.01%	0.02%	0.01%	0.05%	0.015	0.003	0.006	0.003	0.015	
													Total
							"Worst Case" Individual HAP	**0.015**	**0.003**	**0.006**	**0.003**	**0.015**	**0.041**
METHODOLOGY							**"Worst Case" Total HAPs**		**0.015**				

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/year) * Weight % HAP * 1 ton/2000 lbs

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

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Vitracoat Epx Black 9753	1.9	0.00%	0.0%	0.0%	0.0%	100.00%	29000.00	2.76	0.00	90%

State Potential Emissions **Add worst case coating to all solvents** **2.76**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
Degreaser Tank 1

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Material	Density (Lb/Gal)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating	Potential VOC tons per year
Compound SC-10	9.43	1300.00	0.42	0.27

State Potential Emissions **0.27**

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Rust Prevention

Company Name: Atwood Mobile Products, LLC
Address City IN Zip: 57912 Charlotte Ave., Elkhart, IN 46517
Permit Number: 039-28841-00701
Plt ID: 039-00701
Reviewer: Bruce Farrar
Date: December 31, 2009

Material	Density (Lb/Gal)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating	Potential VOC tons per year
Compound A-97P Rust Preventative	6.88	365.00	6.04	1.10

State Potential Emissions **1.10**

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
Three Stage Parts Washer

Company Name: Atwood Mobile Products, LLC
Address City IN Zip: 57912 Charlotte Ave., Elkhart, IN 46517
Permit Number: 039-28841-00701
Plt ID: 039-00701
Reviewer: Bruce Farrar
Date: December 31, 2009

Material	Density (Lb/Gal)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating	Potential VOC tons per year
Compound SC-RP-6 Cleaner	9.18	4302.00	0.50	1.08
Solvol Additive	6.68	103.00	6.22	0.32
Compound RP-111 Rust Inhibitor	6.68	8604.00	0.85	3.66

State Potential Emissions **5.05**

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Atwood Mobile Products, LLC
Address City IN Zip: 57912 Charlotte Ave., Elkhart, IN 46517
Permit Number: 039-28841-00701
Plt ID: 039-00701
Reviewer: Bruce Farrar
Date: December 31, 2009

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(E70S)	18	0.57		0.0052	0.0005	0.00001	0.00001	0.053	0.005	0.000	0.0001026	0.005
GMAW (E70S)	1	0.03		0.0211	0.0009	0.00001	0.00001	0.001	0.000	0.000	0.0000003	0.000
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Laser Cutting**	1	0.375	150	0.0039				0.013	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.07				0.01
Potential Emissions lbs/day								1.61				0.13
Potential Emissions tons/year								0.29				0.02

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

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

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

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

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

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

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Unit Description
3.5	30.7	Powder Coat Bake Oven
2.5	21.9	Powder Coat Dry-Off Oven
2.75	24.1	Powder Coat Washer, Burner 1
1.75	15.3	Powder Coat Washer, Burner 2
1.75	15.3	Powder Coat Washer, Burner 3
2.5	21.9	Powder Coat Room
0.30	2.6	Burn-Off Oven, 2 Burners
4.00	35.0	Parts Washer, 2 Units
3.85	33.7	E-Coat Line Dryer
2.35	20.6	E-Coat Line Wash
25.3	221.2	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.2	0.8	0.1	11.1	0.6	9.3

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 10 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Company Name: Atwood Mobile Products, LLC
Address City IN Zip: 57912 Charlotte Ave., Elkhart, IN 46517
Permit Number: 039-28841-00701
Plt ID: 039-00701
Reviewer: Bruce Farrar
Date: December 31, 2009

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.322E-04	1.327E-04	8.295E-03	1.991E-01	3.760E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.530E-05	1.217E-04	1.548E-04	4.203E-05	2.322E-04

Methodology is the same as page 9.

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

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

Company Name: **Atwood Mobile Products, LLC**
Address City IN Zip: **57912 Charlotte Ave., Elkhart, IN 46517**
Permit Number: **039-28841-00701**
Plt ID: **039-00701**
Reviewer: **Bruce Farrar**
Date: **December 31, 2009**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Unit Description
2.5	21.9	Air Make-Up, Powder Coat Dept
3.025	26.5	Air Make-Up, E-Coat Dept
2.5	21.9	Air Make-Up, Chair Dept
1.75	15.3	Air Make-Up, RAK Dept
3.9	34.2	Air Make-Up, Shipping
0.112	1.0	Air Make-Up, Tool Room
1.60	14.0	Furnances (4 Units)
0.15	1.3	Furnance, HR Hall
0.107	0.9	Furnance, Closet, Front Offices
0.875	7.7	Radiant Tube Heaters (7 Units)
16.5	144.7	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.5	0.04	7.2	0.4	6.1

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 12 for HAPs emissions calculations.

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

Company Name: Atwood Mobile Products, LLC
Address City IN Zip: 57912 Charlotte Ave., Elkhart, IN 46517
Permit Number: 039-28841-00701
Plt ID: 039-00701
Reviewer: Bruce Farrar
Date: December 31, 2009

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.519E-04	8.682E-05	5.426E-03	1.302E-01	2.460E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.618E-05	7.959E-05	1.013E-04	2.749E-05	1.519E-04

Methodology is the same as page 11.

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

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

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

TO: Dennis Wilson

Atwood Mobile Products
57912 Charlotte Ave
Elkhart IN 46517

DATE: Jan. 29, 2010

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

SUBJECT: Final Decision
Registration
039-28841-00701

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:
Tom Hayward Plant Mgr Atwood Mobile Products
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.

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Mail Code 61-53

IDEM Staff	BMILLER 1/29/2010 Atwood Mobile Products 039-28841-00701 (final)		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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		Dennis Wilson Atwood Mobile Products 57912 Charlotte Ave Elkhart IN 46517 (Source CAATS) ***Via Confirmed Delivery***									
2		Tom Hayward Plant Mgr Atwood Mobile Products 57912 Charlotte Ave Elkhart IN 46517 *(RO CAATS)*									
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 *(Local Official)*									
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											
8											
9											
10											
11											
12											
13											
14											
15											

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 ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** 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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