



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: July 7, 2010

RE: Dometic, LLC / 039-29277-00699

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 12/3/07



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Thomas Christophel
Dometic LLC
2310 Industrial Parkway
Elkhart, IN, 46516

July 7, 2010

Re: M039-29277-00699
First Minor Revision to
M039-28368-00699

Dear Mr. Christophel:

Dometic LLC was issued a Minor Source Operating Permit (MSOP) No. M039-28368-00699 on November 20, 2009, for the stationary production of rigid polyurethane foam insulated refrigerator units for the recreational vehicle industry located at 2310 Industrial Parkway, Elkhart, In 46516. On May 19, 2010, the Office of Air Quality (OAQ) received an application from the source requesting the addition of two (2) production lines to the facility to manufacture refrigeration unit components; one (1) production line to produce cooling units, and one (1) production line to produce fin-pack units. Also, upon further review, based on emission rate testing results submitted by the Permittee the VOC emission rate is being changed for the facility's existing rigid polyurethane foam insulating lines. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Swarna Prabha, of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC /SP

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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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 operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

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

Operation Permit No.: M039-28368-00699	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2009 Expiration Date: November 20, 2014

Operation Permit No.: M039-29277-00699	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 7, 2010 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)]

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, Indiana 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

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) Cooling Unit Production Line:
- (1) Welding operations for fabricating cooling units from steel tubing, consisting of 25 robotic welding stations and ten (10) manual welding stations using carbon steel electrode for MIG welders, identified as C001, approved for construction in 2010, using a maximum of 1.8 lbs/hr of ER5154 electrode per station, producing a maximum of 79 cooling units per hour combined, each station consists of an exhaust hood, ducted through filters controlling emissions and exhausting inside the building.
 - (2) One (1) aqueous parts washer, heated by a 2.00 MMBtu/hr natural gas water heater, identified as C002, to clean and treat cooling units, venting water vapors through C2 and C3.
 - (3) One (1) cooling unit washer drying oven, identified as CU003, rated at 1.5 MMBtu/hr of natural gas to dry washed cooling units, venting through C4.
 - (4) One (1) cooling unit dip coating operation, identified as CU004, approved for construction in 2010, used to apply surface coating to metal cooling units for refrigeration units, with a maximum capacity of 301 cooling units per hour, using 1.6 gal/hr of paint, and exhausting outside through vent C5.
 - (5) One (1) cooling unit paint drying oven, identified as CU005, rated at 1.5 MMBtu/hr of natural gas to dry painted cooling units, exhausting outside through vents through C6 and C7.

(d) Fin-Pack Unit Production Line:

- (1) One (1) fin-pack stamping unit using a hydraulic press to stamp aluminum stock, identified as FP001, approved for construction in 2010, using a maximum of 0.52 gal/hr of ethanol blend as a lubricant within the stamping unit, with a maximum capacity of 80 fin-pack units per hour, and exhausting outside through vent FP3.
- (2) One (1) fin-pack dip coating operation, identified as FP002, approved for construction in 2010, used to apply surface coating to metal fin-pack units for refrigeration units, with a maximum capacity of 96 fin-pack units per hour, using a maximum 0.43 gal/hr of paint, and exhausting outside through vent FP2.
- (3) One (1) fin-pack paint drying oven, identified as FP003, rated at 1.0 MMBtu/hr of natural gas to dry painted fin-pack units, exhausting outside through vent FP1.

(e) 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]

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

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

- (a) This permit, M039-28368-00699, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than 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 Permittee shall implement the PMPs.

- (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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 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 an affirmation that the statements in the application are true and complete 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than 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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.

- (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]

- (a) For performance testing required by this permit, 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance 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) 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 to 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) Cooling Unit Production Line:

- (1) Welding operations for fabricating cooling units from steel tubing, consisting of 25 robotic welding stations and ten (10) manual welding stations using carbon steel electrode for MIG welders, identified as C001, approved for construction in 2010, using a maximum of 1.8 lbs/hr of ER5154 electrode per station, producing a maximum of 79 cooling units per hour combined, each station consists of an exhaust hood, which is ducted through filters controlling emissions and exhausting inside the building.
- (2) One (1) aqueous parts washer, heated by a 2.00 MMBtu/hr natural gas water heater, identified as C002, to clean and treat cooling units, venting water vapors through C1, C2 and C3.
- (3) One (1) cooling unit washer drying oven, identified as CU003, rated at 1.5 MMBtu/hr of natural gas to dry washed cooling units, venting through C4.
- (4) One (1) cooling unit dip coating operation, identified as CU004, approved for construction in 2010, used to apply surface coating to metal cooling units for refrigeration units, with a maximum capacity of 301 cooling units per hour, using 1.6 gal/hr of paint, and exhausting outside through vent C5.
- (5) One (1) cooling unit paint drying oven, identified as CU005, rated at 1.5 MMBtu/hr of natural gas to dry painted cooling units, exhausting outside through vents through C6 and C7.

(d) Fin-Pack Unit Production Line:

- (1) One (1) fin-pack stamping unit using a hydraulic press to stamp aluminum stock, identified as FP001, approved for construction in 2010, using a maximum of 0.52 gal/hr of ethanol blend as a lubricant within the stamping unit, with a maximum capacity of 80 fin-pack units per hour, and exhausting outside through vent FP3.
- (2) One (1) fin-pack dip coating operation, identified as FP002, approved for construction in 2010, used to apply surface coating to metal fin-pack units for refrigeration units, with a maximum capacity of 96 fin-pack units per hour, using a maximum 0.43 gal/hr of paint, and exhausting outside through vent FP2.
- (3) One (1) fin-pack paint drying oven, identified as FP003, rated at 1.0 MMBtu/hr of natural gas to dry painted fin-pack units, exhausting outside through vent FP1.

(e) 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, cooling unit production line, fin-pack production line, and combustion units 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.

D.1.3 VOC Limit [326 IAC 8-2-9]

- (a) The cooling unit dip coating operation, CU004 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.
- (b) The fin-pack dip coating operation, FP002 shall use less than (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 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.

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.3 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 and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (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.1.3.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C – General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

**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).

Company Name:	Dometic LLC
Address:	2310 Industrial Parkway
City:	Elkhart, Indiana 46516
Phone #:	(574) 294-2511
MSOP #:	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.

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

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

Noncompliance:

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

Source Name: Dometic LLC.
Source Address: 2310 Industrial Parkway, Elkhart, IN 46516
MSOP No.: M039-28368-00699
Facility: Cooling Unit dip coating- CU004
Parameter: VOC usage
Limit: 15 lbs per day

Month: _____ Year: _____

Day		Day	
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
Quarterly Report

Source Name: Dometic LLC.
Source Address: 2310 Industrial Parkway, Elkhart, IN 46516
MSOP No.: M039-28368-00699
Facility: Fin-Pack dip coating - FP002
Parameter: VOC usage
Limit: 15 lbs per day

Month: _____ Year: _____

Day		Day	
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: _____

MALFUNCTION REPORT

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

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 May 19, 2009 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M039-29277-00699, 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 Minor Permit Revision to a Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	Dometic LLC
Source Location:	2310 Industrial Parkway, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3630
MSOP Permit No.:	M039-28368-00699
Minor Permit Revision No.:	M039-29277-00699
Permit Reviewer:	Swarna Prabha

On May 19, 2010, the Office of Air Quality (OAQ) has received an application from Dometic LLC., related to the modifications to an existing plant, manufacturing rigid polyurethane foam for insulating refrigeration equipments for the recreational vehicle industry.

Existing Approvals

The source was issued MSOP No. 039-28368-00699 on November 20, 2009.

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.

¹Attainment 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 15th, 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.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Emission calculations for the cooling unit and fin-pack production lines were provided by the Permittee and verified by the Indiana Department of Environmental Management, Office of Air Quality.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit (tons/year)								
	PM	*PM ₁₀	PM _{2.5}	SO ₂	*VOC	CO	NO _x	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	0.0219	0.0219 (diisocyanate)
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)
Total PTE of Entire Source	0.12	0.46	0.46	0.04	26.10	5.11	5.53	0.136	0.0219 (diisocyanate)
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 ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM ₁₀ emissions as surrogate for PM _{2.5} 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 _{2.5} in AP42, PM ₁₀ = PM _{2.5} ***These emissions are based upon Appendix A to the TSD for MSOP NO: M 039-28368-00699, issued on November 20, 2009. Alternative emission factor was provided by the Permittee for VOC emission rate from the existing foam insulation operations based on the study done by Canon USA. The VOC emissions from rigid polyurethane foam insulation operations are updated in Table " PTE of the Entire Source After Issuance of the MSOP Revision " to reflect the VOC emission rate test conducted on April 27, 2010 by the source pursuant to the Condition D.1.3 specified in Permit No. 039-28368-00060. There is an increase of VOC emissions of 15.7 tons per year from Foam Insulation Operation which is not included in the above table.									

Permit Level Determination – MSOP Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dometic LLC., on May 19, 2010, relating to the addition of two (2) production lines to the facility to manufacture refrigeration unit components; the cooling unit production line, and the fin-pack production line. The cooling unit production line will produce cooling units and consists of manual and robotic welding stations, water heated aqueous parts washer washing, paint dipping and paint drying operations. The fin-pack production line will produce fin-pack units and consists of stamping, paint dipping and paint drying operations.

The permittee also conducted and submitted to IDEM, the VOC emission rate test results from the existing foam insulation operations, related to the Conditions D.1.3 specified in Minor Source Operating Permit issued on November 20, 2009. Based on the test conducted by the Permittee, the VOC emission rate is increased to 8.04% instead of 5%, (Alternative emission factor provided by the Permittee based on the study done by Cannon USA). This revision also includes the revised VOC emission factor for the foam insulation operations. The VOC emissions from each of the rigid polyurethane foam production lines are less than 25 tons per year and source-wide emissions are still less than the part 70 threshold of 100 tons per year. This change is not due to the modification made to the existing emission units.

The following is a list of the new emission units and pollution control devices:

(1) Cooling Unit Production Line:

(a) Welding operations for fabricating cooling units from steel tubing, consisting of 25 robotic welding stations and ten (10) manual welding stations using carbon steel electrode for MIG welders, identified as C001, approved for construction in 2010, using a maximum of 1.8 lbs/hr of ER5154 electrode per station producing a maximum of 79 cooling units per hour combined, each station consists of an exhaust hood, which is ducted through filters controlling emissions, and exhausting inside the building.

(b) One (1) aqueous parts washer, heated by a 2.00 MMBtu/hr natural gas heater, identified as C002, to clean and treat cooling units, venting water vapors through C1, C2 and C3.

NOTE: The cleaning chemicals do not contain any HAPs or VOCs.

(c) One (1) cooling unit washer drying oven, identified as CU003, rated at 1.5 MMBtu/hr of natural gas to dry washed cooling units, venting through C4.

(d) One (1) cooling unit dip coating operation, identified as CU004, approved for construction in 2010, used to apply surface coating to metal cooling units for refrigeration units, with a maximum capacity of 301 cooling units per hour, using 1.6 gal/hr of paint, and exhausting outside through vent C5.

NOTE: The rated capacity of the thirty five (35) welding units is 79 cooling units per hour, therefore welding operation causes a bottle neck for the number of cooling units dip coated per hour. The actual cooling units dip coated are 79 units per hour. The maximum number of cooling units dip coated per hour without bottleneck is 301, therefore, maximum units dip coated per year is 2,636,760.

(e) One (1) cooling unit paint drying oven, identified as CU005, rated at 1.5 MMBtu/hr of natural gas to dry painted cooling units, exhausting outside through vents C6 and C7.

(2) Fin-Pack Unit Production Line:

(a) One (1) fin-pack stamping unit using hydraulic press to stamp aluminum stock, identified as FP001, approved for construction in 2010, using a maximum of 0.52 gal/hr of ethanol blend as a lubricant within the stamping unit, with a maximum capacity of 80 fin-pack units per hour, and exhausting outside through vent FP3.

- (b) One (1) fin-pack dip coating operation, identified as FP002, approved for construction in 2010, used to apply surface coating to metal fin-pack units for refrigeration units, with a maximum capacity of 96 fin-pack units per hour, using a maximum 0.43 gal/hr of paint, and exhausting outside through vent FP2.

NOTE: (A) The rated capacity of the stamping unit is 80 fin-pack units per hour, therefore stamping process causes a bottle neck for the operation of fin-pack dip coating. The actual fin-pack units dip coated are 80 units per hour. The maximum number of fin-pack units dip coated per hour without bottleneck is 96, therefore maximum units dip coated per year is 840,960.

(B) The applicant has assumed that 100% of VOC will be emitted during the fin-pack paint dipping operation, therefore there are no VOC emissions included from the drying process of the painted fin-pack unit in the drying oven.

- (c) One (1) fin-pack paint drying oven, identified as FP003, rated at 1.0 MMBtu/hr of natural gas to dry painted fin-pack units, exhausting outside through vent FP1.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential to Emit (PTE) of the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
(35) welding stations (C001)-Cooling unit	6.65	6.65	6.65	0	0	0	0	0.133	0.133 (Manganese)
(1) aqueous parts washer water heater (C002)- Cooling unit	0.02	0.067	0.067	0.005	0.876	0.048	0.736	0.016	0.016 (Hexane)
(1) washer drying oven (CU003)- Cooling unit	0.01	0.05	0.05	0.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
One (1) paint dipping (CU004) - Cooling unit	0	0	0	0	0	5.25**	0	negl.	negl.
One (1) paint drying oven (CU005) - Cooling unit	0.01	0.05	0.05	.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
fin-pack stamping (FP001) - Fin-Pack line	0	0	0	0	0	15.09	0	0.79	0.65 (Methanol)
paint dipping (FP002) - Fin-Pack line	0	0	0	0	0	11.34**	0	0	0
paint drying oven (FP003)- Fin-Pack line	0.01	0.033	0.033	0.003	0.438	0.024	0.368	negl.	negl.
Total	6.7	6.85	6.85	0.016	2.63	31.82	2.21	3.17	0.133 (Manganese)
Minor Permit Revision Thresholds	≥ 5 < 25	≥ 5 < 25	≥ 5 < 25	≥ 10 < 25	≥ 10 < 25	≥ 10 < 25	≥ 25 < 100	< 10	< 25
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". US EPA has directed states to regulate PM ₁₀ emissions as surrogate for PM _{2.5} emissions. ** Maximum rated capacity of the production lines.									

This MSOP is being revised through a MSOP Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(4)(B), because the revision involves the construction and addition of two (2) production lines, the cooling units and the fin-pack units, to the facility to manufacture refrigeration unit components, with potential to emit (PTE) of VOC within the ranges specified in 326 IAC 2-6.1-6(g)(4)(B).

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC**	CO	Total HAPs	Worst Single HAP
**Foam Insulation Operation (3) Metering Lines including service area	0.0	0.0	0.0	0.0	0.0	25.74 41.40	0.0	0.0	0.0
PMDI Storage Tanks-T002	0.0	0.0	0.0	0.0	0.0	0.022	0.0	0.022	0.022 (diisocyanate)
Natural gas combustion units - Air Handlers	0.12	0.46	0.46	0.04	5.53	0.33	5.11	0.115	0.10 (Hexane)
(35) welding stations (C001)-Cooling unit	6.65	6.65	6.65	0	0	0	0	0.133	0.133 (Manganese)
(1) aqueous parts washer water heater (C002)- Cooling unit	0.02	0.067	0.067	0.005	0.876	0.048	0.736	0.016	0.016 (Hexane)
(1) washer drying oven (CU003)- Cooling unit	0.01	0.05	0.05	0.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
One (1) paint dipping (CU004) - Cooling unit	0	0	0	0	0	5.25***	0	negl.	negl.
One (1) paint drying oven (CU005) - Cooling unit	0.01	0.05	0.05	.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
fin-pack stamping (FP001) - Fin-Pack line	0	0	0	0	0	15.09	0	0.79	0.65 (Methanol)
paint dipping (FP002) - Fin-Pack line	0	0	0	0	0	11.34***	0	0	0
paint drying oven (FP003)- Fin-Pack line	0.01	0.033	0.033	0.003	0.438	0.024	0.368	negl.	negl.
Total PTE of Entire Source	6.82	7.31	7.31	0.05	8.16	73.58	7.31	.008	0.65 (Methanol)
Title V Major Source Thresholds	NA	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 (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

** The VOC emissions from rigid polyurethane foam insulation operations are updated to reflect the test conducted on April 27, 2010 by the source pursuant to the Condition D.1.3 specified in Permit No. 039-28368-00060. This change is not due to the modification to the existing units.

***The VOC emissions from paint dipping operation for cooling and fin-pack production lines are based on the maximum dip coating capacity of the systems, although due to the welding and fin-pack stamping operation both production lines have a bottleneck, as a result less units are painted and actual VOC's are less than the listed amount on this table. The Permittee does not have to keep record of how many units are painted per hour.

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
**Foam Insulation Operation (3) Metering Lines including service area	0.0	0.0	0.0	0.0	0.0	41.40	0.0	0.0	0.0
PMDI Storage Tanks-T002	0.0	0.0	0.0	0.0	0.0	0.022	0.0	0.022	0.022 (diisocyanate)
Natural gas combustion units - Air Handlers	0.12	0.46	0.46	0.04	5.53	0.33	5.11	0.115	0.10 (Hexane)
(35) welding stations (C001)-Cooling unit	6.65	6.65	6.65	0	0	0	0	0.133	0.133 (Manganese)
(1) aqueous parts washer water heater (C002)- Cooling unit	0.02	0.067	0.067	0.005	0.876	0.048	0.736	0.016	0.016 (Hexane)
(1) washer drying oven (CU003)-Cooling unit	0.01	0.05	0.05	0.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
One (1) paint dipping (CU004) - Cooling unit	0	0	0	0	0	5.25	0	negl.	negl.
One (1) paint drying oven (CU005) - Cooling unit	0.01	0.05	0.05	.004	0.657	0.036	0.552	0.012	0.012 (Hexane)
fin-pack stamping (FP001) - Fin-Pack line	0	0	0	0	0	15.09	0	0.79	0.65 (Methanol)
Paint Dipping (FP002) - Fin-Pack line	0	0	0	0	0	11.34	0	0	0
paint drying oven (FP003)- Fin-Pack line	0.01	0.033	0.033	0.003	0.438	0.024	0.368	negl.	negl.
Total PTE of Entire Source	6.82	7.31	7.31	0.05	8.16	73.58	7.31	.008	0.65 (Methanol)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible									

MSOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The drying oven does not burn solid waste, as defined in 40 CFR 60, Subpart E. Therefore, the requirements of the New Source Performance Standards for Incinerators, 40 CFR 60, Subpart E, are not included in this permit.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart PPPP, Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480 - 63.4581), because the source is not a major source of HAPs as defined in 40 CFR 63.2, and the source does not surface coat plastic parts or products.
- (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.
- (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, Subpart HHHHHH (326 IAC 20), are not included for this proposed revision because this source uses dipping application methods, although it will be coating metal or plastic parts, will not be using coatings containing any of the metal HAPs (cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni)), and will not be performing paint stripping using Methylene Chloride.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63.11514, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) are not included in the permit, because this source does not have the potential to emit metals, defined to be the compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), in the amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal). Also, 40 CFR Part 63.11514, Subpart XXXXXX is not applicable to this source because the SIC code for this source is 3630.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

326 IAC 2-6.1 (MSOP)

MSOP applicability is discussed under the Permit Level Determination- MSOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration)

This modification to an existing PSD (326 IAC 2-2) minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be 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 proposed revision is not subject to the requirements of 326 IAC 2-4.1 because the unlimited potential to emit 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.

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.

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.

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.

State Rule Applicability - Cooling Unit Production Line:

326 IAC 6-3-1(b)

Pursuant to 326 IAC 6-3-1(b), the surface coatings applied using dip, roll, flow or brush application methods do not generate particulate emissions or emit only negligible amounts of particulates. Therefore, cooling unit dip coating operation is not subject to this rule.

326 IAC 8-1-6 (VOC Rules; General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, the proposed revision is not subject to the requirements of 326 IAC 8-

1-6, since the unlimited VOC potential emissions from the cooling unit paint dipping operation and drying oven is less than twenty-five (25) tons per year each.

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 cooling unit paint dipping operation and drying oven, 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 8-3 (Organic Solvent and Degreasing Operations)

Pursuant to 326 IAC 8-3, the organic solvent degreasing operation must use a solvent that contains volatile organic compounds (VOC). The cooling unit aqueous parts washer does not use cleaning chemicals that contain any HAPs or VOC. Therefore, 326 IAC 8-3 is not applicable.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. However due to the bottleneck, the VOC emissions are less than fifteen (15) lbs/day for the cooling unit dip coating operation. Compliance with this limit renders the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

Therefore, the owner or operator of this source shall comply with the following:

- (1) The VOC usage for the cooling unit dip coating operation shall be less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) 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 cooling unit dip coating operation on a daily basis. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the cooling unit dip coating operation:
 - (A) The VOC content of each coating material and solvent used less water.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (C) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
- (3) Unless otherwise specified in this MSOP, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this MSOP.

There are no other 326 IAC 8 Rules that are applicable to the facility.

State Rule Applicability - Fin-Pack Unit Production Line

326 IAC 8-1-6 (VOC Rules; General Reduction Requirements)

The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from fin-pack line is less than twenty-five (25) tons per year.

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 fin-pack stamping line, paint dipping operation and drying oven, 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 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. However due to the bottleneck, the VOC emissions are less than fifteen (15) lbs/day for the fin-pack unit dip coating operation. Compliance with this limit renders the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

Therefore, the owner or operator of this source shall comply with the following:

- (1) The VOC usage for the cooling unit dip coating operation shall be less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) 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 fin-pack unit dip coating operation on a daily basis. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the cooling unit dip coating operation:

- (A) The VOC content of each coating material and solvent used less water.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (C) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.

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

Natural Gas Combustion- Cooling Unit Production Line and Fin-Pack Production Line

326 IAC 4-2-2 (Incinerators)

- (a) Pursuant to 326 IAC 4-2-2, affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The natural gas-fired- cooling unit drying ovens, identified as CU003 and CU005 and water heater, CU002, each, are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to this revision.
- (b) Pursuant to 326 IAC 4-2-2, affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The natural gas-fired- fin-pack unit drying oven, identified as FP003 is not an incinerator, as defined by 326 IAC 1-2-34, since it does not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to this revision.

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

The natural gas-fired ovens, identified as CU003, CU005 and FP003 and water heater CU002, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 does not apply to this proposed revision.

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

Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The natural gas-fired drying ovens, identified as CU003, CU005 and FP003 and water heater CU002, each, do not meet the definition of a "manufacturing process", and are therefore exempt from the requirements of 326 IAC 6-3. Consequently, the requirements are not included for this proposed revision.

326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from the natural gas-fired drying ovens, identified as CU003, CU005 and FP003 and water heater CU002, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326IAC 7-1.1-2 does not apply to this revision, and the requirements are not included for this proposed revision.

MIG welding operation - Cooling Unit Production Line:

- (1) Pursuant to 326 IAC 6-3-1(b)(9), the thirty five (35) MIG welding stations, are each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day each.

Compliance Determination, Monitoring and Testing Requirements
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Testing Requirements

There are no specific testing requirements for this revision because compliance with the MSOP limit for VOC can be determined by evaluating MSDSs and keeping records of the amount of VOC applied.

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M039-28368-00699, issued on November 20, 2009.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

The new unit description is added to Conditions A.2 and D.1 and emission limitations are revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary

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

...

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, cooling unit **production line**, fin-pack production lines, and combustion units such that the potential to emit VOC of the entire source is greater than the Part 70 thresholds requires prior approval from IDEM.

..

- (c) **Cooling Unit Production Line:**

- (1) **Welding operations for fabricating cooling units from steel tubing, consisting of 25 robotic welding stations and ten (10) manual welding stations using carbon steel electrode for MIG welders, identified as C001, approved for construction in 2010, using a maximum of 1.8 lbs/hr of ER5154 electrode per station, producing a maximum of 79 cooling units per hour combined, each station consists of an exhaust hood, which is ducted through filters controlling emissions and exhausting inside the building.**
- (2) **One (1) aqueous parts washer, heated by a 2.00 MMBtu/hr natural gas water heater, identified as C002, to clean and treat cooling units, venting water vapors through C1, C2 and C3.**

- (3) One (1) cooling unit washer drying oven, identified as CU003, rated at 1.5 MMBtu/hr of natural gas to dry washed cooling units, venting through C4.**
- (4) One (1) cooling unit dip coating operation, identified as CU004, approved for construction in 2010, used to apply surface coating to metal cooling units for refrigeration units, with a maximum capacity of 301 cooling units per hour, using 1.6 gal/hr of paint, and exhausting outside through vent C5.**
- (5) One (1) cooling unit paint drying oven, identified as CU005, rated at 1.5 MMBtu/hr of natural gas to dry painted cooling units, exhausting outside through vents through C6 and C7.**

(d) Fin-Pack Unit Production Line:

- (1) One (1) fin-pack stamping unit using a hydraulic press to stamp aluminum stock, identified as FP001, approved for construction in 2010, using a maximum of 0.52 gal/hr of ethanol blend as a lubricant within the stamping unit, with a maximum capacity of 80 fin-pack units per hour, and exhausting outside through vent FP3.**
- (2) One (1) fin-pack dip coating operation, identified as FP002, approved for construction in 2010, used to apply surface coating to metal fin-pack units for refrigeration units, with a maximum capacity of 96 fin-pack units per hour, using a maximum 0.43 gal/hr of paint, and exhausting outside through vent FP2.**
- (3) One (1) fin-pack paint drying oven, identified as FP003, rated at 1.0 MMBtu/hr of natural gas to dry painted fin-pack units, exhausting outside through vent FP1.**

~~(e)~~ **(e) Natural Gas-fired space heaters:**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

....

(c) **Cooling Unit Production Line:**

- (1) **Welding operations for fabricating cooling units from steel tubing, consisting of 25 robotic welding stations and ten (10) manual welding stations using carbon steel electrode for MIG welders, identified as C001, approved for construction in 2010, using a maximum of 1.8 lbs/hr of ER5154 electrode per station, producing a maximum of 79 cooling units per hour, combined, each station consists of an exhaust hood, which is ducted through piped filters controlling emissions and exhausting inside the building.**
- (2) **One (1) aqueous parts washer, heated by a 2.00 MMBtu/hr natural gas water heater, identified as C002, to clean and treat cooling units, venting water vapors through C1, C2 and C3.**
- (3) **One (1) cooling unit washer drying oven, identified as CU003, rated at 1.5 MMBtu/hr of natural gas to dry washed cooling units, venting through C4.**
- (4) **One (1) cooling unit dip coating operation, identified as CU004, approved for construction in 2010, used to apply surface coating to metal cooling units for refrigeration units, with a maximum capacity of 301 cooling units per hour, using 1.6 gal/hr of paint, and exhausting outside through vent C5.**
- (5) **One (1) cooling unit paint drying oven, identified as CU005, rated at 1.5 MMBtu/hr of natural gas to dry painted cooling units, exhausting outside through vents through C6 and C7.**

(d) **Fin-Pack Unit Production Line:**

- (1) **One (1) fin-pack stamping unit using a hydraulic press to stamp aluminum stock, identified as FP001, approved for construction in 2010, using a maximum of 0.52 gal/hr of ethanol blend as a lubricant within the stamping unit, with a maximum capacity of 80 fin-pack units per hour, and exhausting outside through vent FP3.**
- (2) **One (1) fin-pack dip coating operation, identified as FP002, approved for construction in 2010, used to apply surface coating to metal fin-pack units for refrigeration units, with a maximum capacity of 96 fin-pack units per hour, using a maximum 0.43 gal/hr of paint, and exhausting outside through vent FP2.**
- (3) **One (1) fin-pack paint drying oven, identified as FP003, rated at 1.0 MMBtu/hr of natural gas to dry painted fin-pack units, exhausting outside through vent FP1.**

(e) **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, cooling unit **production line**, and fin-pack production lines, and combustion units 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.

D.1.3 VOC Limit [326 IAC 8-2-9]

- (a) **The cooling unit dip coating operation, CU004 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.**
- (b) **The fin-pack dip coating operation, FP002 shall use less than (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.**

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] [326 IAC 8-1-6]

...

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.3 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 and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) **To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish**

compliance with the VOC usage limit established in Condition D.1.3.

- (1) **The VOC content of each coating material and solvent used less water.**
- (2) **The amount of coating material and solvent used on a daily basis.**
 - (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C – General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

Additional Changes

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

**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**

**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**

- (2) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (3) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C contains the Permittee's obligations with regard to the records required by this condition."
- (4) IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been switched to "no later than" or "not later than".
- (5) IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to

- include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
- (6) IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.
 - (7) IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
 - (8) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
 - (9) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
 - (10) IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
 - (11) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
 - (12) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
 - (13) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
 - (14) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
 - (15) The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

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

The Permittee owns and operates a stationary 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

....
SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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]

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)]

- (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]

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

~~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~~

~~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~~

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

~~B.9 Duty to Provide Information~~

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

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

~~B.10 Certification~~

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

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

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

~~B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

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

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

~~Indiana Department of Environmental Management
Compliance 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]~~

~~(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]~~

- ~~(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)]~~

~~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 46204-2254~~

- ~~(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(c)(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 46204-2254

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]~~

~~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]

- (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 46204-2254

~~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]~~

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

~~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]~~

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

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

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

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

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

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

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

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

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

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~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]~~

- (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 46204-2254~~

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

- (b) ~~The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) ~~Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

Compliance Requirements [326 IAC 2-1.1-11]

C.9 ~~Compliance Requirements [326 IAC 2-1.1-11]~~

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

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

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

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

~~C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

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

- ~~(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.~~
- ~~(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.~~

Corrective Actions and Response Steps

~~C.13 Response to Excursions or Exceedances~~

- ~~(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.~~
- ~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - ~~(1) initial inspection and evaluation;~~
 - ~~(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or~~
 - ~~(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~~~
- ~~(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - ~~(1) monitoring results;~~
 - ~~(2) review of operation and maintenance procedures and records; and/or~~
 - ~~(3) inspection of the control device, associated capture system, and the process.~~~~
- ~~(d) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

- (e) ~~_____~~ The Permittee shall maintain the following records:
 - (1) ~~_____~~ monitoring data;
 - (2) ~~_____~~ monitor performance data, if applicable; and
 - (3) ~~_____~~ corrective actions taken.

~~C.14 _____~~ ~~Actions Related to Noncompliance Demonstrated by a Stack Test~~

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

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

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

~~C.15 _____~~ ~~Malfunctions Report [326 IAC 1-6-2]~~

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

- (a) ~~_____~~ A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) ~~_____~~ When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) ~~_____~~ Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) ~~_____~~ Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

~~C.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 46204-2254~~
- ~~(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.~~

**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: _____

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M039-28368-00699, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than 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 Permittee shall implement the PMPs.

- (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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 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 an affirmation that the statements in the application are true and complete 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than 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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.

- (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]

- (a) For performance testing required by this permit, 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (c) 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.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

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

Indiana Department of Environmental Management
Compliance 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) **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.**

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 May 19, 2010.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Revision No. 039-29277-00699. The staff recommends to the Commissioner that this MSOP Minor Revision 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 (45376).
- (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

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	Natural Gas	Cooling unit production Line					Fin -Pack Production Line			TOTAL
				Combustion	C001	CU002	CU003	CU004	CU005	FP001	FP002	FP003	
			T002	units- Air Handlers	35 Welding stations	Aquous Parts Washer Water heater	Washer drying oven	Paint dipping	Paint drying oven	Fin -Pack Stamping	Paint Dipping	Paint Drynig oven	
Hazardous Air Pollutants	PM	0.00	0.0	0.12	6.65	0.02	0.01	0.00	0.01	0.00	0.00	0.01	6.82
	PM10	0.00	0.0	0.46	6.65	0.07	0.05	0.00	0.05	0.00	0.00	0.03	7.31
	PM2.5	0.00	0.0	0.46	6.65	0.07	0.05	0.00	0.05	0.00	0.00	0.03	7.31
	SO2	0.00	0.0	0.04	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.05
	NOx	0.00	0.0	5.53	0.00	0.88	0.66	0.00	0.66	0.00	0.00	0.44	8.16
	VOC	41.40	0.022	0.33	0.00	0.05	0.04	5.25	0.04	15.09	11.34	0.02	73.58
	CO	0.00	0.0	5.11	0.00	0.74	0.55	0.00	0.55	0.00	0.00	0.37	7.31
	Manganese	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.33E-01
	Acetaldehyde	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Xylenes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Toluene	0.00	0.00	2.13E-04	0.00	2.98E-05	2.23E-05	0.00	2.23E-05	0.00	0.00	1.49E-05	3.02E-04
	Ethyl Benzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Benzene	0.00	0.00	1.31E-04	0.00	1.84E-05	1.38E-05	0.00	1.38E-05	0.00	0.00	9.20E-06	1.87E-04
Diphenylmethane-diisocyanate	0.00	0.022	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.19E-02	
Glycol Ethers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	
Hexane	0.00	0.00	1.13E-01	0.00	1.58E-02	1.18E-02	0.00	1.18E-02	0.00	0.00	7.88E-03	1.60E-01	
Formaldehyde	0.00	0.00	4.69E-03	0.00	6.57E-04	4.93E-04	0.00	4.93E-04	0.00	0.00	3.29E-04	6.66E-03	
Chromium	0.00	0.00	8.76E-05	0.00	1.23E-05	9.20E-06	0.00	9.20E-06	0.00	0.00	6.13E-06	1.24E-04	
Nickel	0.00	0.00	1.31E-04	0.00	1.84E-05	1.38E-05	0.00	1.38E-05	0.00	0.00	9.20E-06	1.87E-04	
Methanol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	6.49E-01	
MIBK	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.36E-01	0.00	0.00	1.36E-01	
Totals	0.00	2.19E-02	0.118	1.33E-01	0.017	0.012	0.000	0.012	0.785	0.000	0.008	0.008	

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	Natural Gas	Cooling unit production Line					Fin Pack Production Line			TOTAL
				Combustion	C001	CU002	CU003	CU004	CU005	FP001	FP002	FP003	
			T002	units- Air Handlers	35 Welding stations	Parts Washer Water heater	Washer drying oven	Paint dipping line	Cooling unit drying oven	Stamping Line	Paint Dipping	drynig oven	
Hazardous Air Pollutants	PM	0.00	0.00	0.12	0.01	0.02	0.01	0.00	0.01	0.00	0.00	0.01	0.17
	PM10	0.00	0.00	0.46	0.01	0.07	0.05	0.00	0.05	0.00	0.00	0.03	0.67
	PM2.5	0.00	0.00	0.46	0.01	0.07	0.05	0.00	0.05	0.00	0.00	0.03	0.67
	SO2	0.0	0.0	0.04	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.05
	NOx	0.0	0.0	5.53	0.00	0.88	0.66	0.00	0.66	0.00	0.00	0.44	8.16
	VOC	41.40	0.022	0.33	0.00	0.05	0.04	5.25	0.04	15.09	11.34	0.02	73.58
	CO	0.0	0.0	5.11	0.00	0.74	0.55	0.00	0.55	0.00	0.00	0.37	7.31
	Manganese	0.00	0.00	0.00	1.60E-04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.60E-04
	Acetaldehyde	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Xylenes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Toluene	0.00	0.00	2.13E-04	0.00	2.98E-05	2.23E-05	0.00	2.23E-05	0.00	0.00	1.49E-05	3.02E-04
	Ethyl Benzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
	Benzene	0.00	0.00	1.31E-04	0.00	1.84E-05	1.38E-05	0.00	1.38E-05	0.00	0.00	9.20E-06	1.87E-04
Diphenylmethane-diisocyanate	0.00	2.19E-02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.19E-02	
Glycol Ethers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	
Hexane	0.00	0.00	1.13E-01	0.00	1.58E-02	1.18E-02	0.00	1.18E-02	0.00	0.00	7.88E-03	1.60E-01	
Formaldehyde	0.00	0.00	4.69E-03	0.00	6.57E-04	4.93E-04	0.00	4.93E-04	0.00	0.00	3.29E-04	6.66E-03	
Chromium	0.00	0.00	8.76E-05	0.00	1.23E-05	9.20E-06	0.00	9.20E-06	0.00	0.00	6.13E-06	1.24E-04	
Nickel	0.00	0.00	1.31E-04	0.00	1.84E-05	1.38E-05	0.00	1.38E-05	0.00	0.00	9.20E-06	1.87E-04	
Methanol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	6.49E-01	
MIBK	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.36E-01	0.00	0.00	1.36E-01	
Totals	0.00	2.19E-02	0.118	1.60E-04	0.017	0.012	0.000	0.012	0.785	0.000	0.008	0.97	

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 directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- There are no emission factors in AP42 for PM2.5, PM10 = PM2.5
- The VOC emissions release rate is 8.04 % based on the test conducted on April 27, 2010, from each of the foam insulation lines and service areas.
- The VOC emissions from each of the foam insulation lines and service area are less still 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
Minor Permit revision No: 039-29277-00699
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 (%) ¹	VOC Content % of Blowing Agent	Potential VOC Emissions (lbs/hour) ²	Anticipated Actual VOC Emissions (lbs/day) ³	Potential VOC Emissions (lbs/day) ⁴	Potential VOC Emissions (lbs/year) ²	Potential VOC Emissions (tons/year) ²	Anticipated Actual VOC Emissions (ton/yr) ²
Metering Unit 1														
A4	cabinets and cooling units	31.3	14.7	458.8	4,019,345.2	5.60	8.04	100.00	2.07	16.53	49.58	18,096.70	9.05	2.07
A5	cabinets and cooling units	31.3	14.7	458.8	4,019,345.2	5.60	8.04	100.00	2.07	16.53	49.58	18,096.70	9.05	2.07
Metering Unit 2														
A6	cabinets and cooling units	18.8	14.7	275.3	2,411,607.1	5.60	8.04	100.00	1.24	9.92	29.75	10,858.02	5.43	1.24
A9	cabinets and cooling units	5.6	14.7	82.6	723,482.1	5.60	8.04	100.00	0.37	2.97	8.92	3,257.41	1.63	0.37
Metering Unit 3														
AD1	Door Foaming Station AD1	40.0	4.0	161.4	1,413,650.8	5.60	8.04	100.00	0.73	5.81	17.44	6,364.82	3.18	0.73
AD2	Door Foaming Station AD2	40.0	4.0	161.4	1,413,650.8	5.60	8.04	100.00	0.73	5.81	17.44	6,364.82	3.18	0.73
AD3	Door Foaming Station AD3	40.0	4.0	161.4	1,413,650.8	5.60	8.04	100.00	0.73	5.81	17.44	6,364.82	3.18	0.73
AD4	Door Foaming Station AD4	40.0	4.0	161.4	1,413,650.8	5.60	8.04	100.00	0.73	5.81	17.44	6,364.82	3.18	0.73
AD5	Door Foaming Station AD5	40.0	4.0	161.4	1,413,650.8	5.60	8.04	100.00	0.73	5.81	17.44	6,364.82	3.18	0.73
Service Area	Service Area	6.0	2.8	16.8	147,168.0	5.60	8.04	100.00	0.08	0.61	1.82	662.61	0.33	0.08

Total 9.45 75.61 226.84 82,795.54 41.40 9.45

During the insulation of the refrigerator units, component A (PMDI) and component B (polyols) are mixed together and injected. The components react quickly to form a rigid polyurethane foam, with minimal emission of VOCs (Cyclopentane).

Notes:

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

¹ VOC release rate (8.04%) based on the test performed by Dometic LLC on April 28, 2010.

²Potential 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.

³ Anticipated actual emissions based on operating at a maximum production of 8 hrs per day.

⁴ 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 * 8.04% 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 Denisty (lbs/gal)]

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

VOC fraction by weight = [VOC Content (lbs/gal)] / [Material Denisty (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 * 8.04% 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
Minor Permit Revision No: 039-29277-00699
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
MSOP Permit Number: 039-28368-00699
Minor Permit Revision No: 039-29277-00699
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	0.548	0.060	0.9
ICE Air Handler-H002	1	2.179	2.179	19.08	0.018	0.07	0.006	0.954	0.052	0.8
Rapid Air Handler-H003	1	0.400	0.400	3.50	0.003	0.01	0.001	0.175	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	0.175	0.010	0.1
Rapid Air Handler- H006	1	0.400	0.400	3.50	0.003	0.013	0.001	0.175	0.010	0.1
Totals	7		13.879	121.6	0.12	0.46	0.036	5.53	0.33	5.11

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
Rapid Air Handler- H006	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
Totals	7		14.279	125.080	0.00013	0.00469	0.11257	0.00021	0.00007	0.00009	0.00013

- *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

**Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Cooling Unit Production Line**

Company Name: Dometic LLC
Address City IN Zip: 2310 Industrial Parkway, Elkhart, Indiana
MSOP Permit Number: 039-28368-00699
Minor Permit Revision No: 039-29277-00699
Reviewer: Swarna Prabha

Maximum Electrode Consumption per station (lbs/hr)	Number of Welding Stations	PM-10 Emission Factor (lbs/lbs of electrode consumed) ¹	Uncontrolled Potential PM-10 Emissions		Capture Efficiency (%)	Control Efficiency (%)	Controlled Potential PM-10 Emissions	
			(lbs/hr)	tons/yr			(lbs/hr)	tons/yr
1.8	35	0.0241	1.52	6.65	100.00	99.88	1.82E-03	0.008

Electrode HAP Content (% Weight) ²		Uncontrolled Potential HAP Emissions		Controlled Potential HAP Emissions	
		(lbs/hr)	tons/yr	(lbs/hr)	tons/yr
Manganese Compounds	2	0.030	0.133	3.64E-05	1.60E-04

Notes:

¹PM-10 emission factor from EPA Publication AP-42, Fifth edition (1/1995 revision), Table 12.19-1

²Electrode HAP content and potential HAP emissions based on the electrode's chemical composition from MSDS.

Methodology:

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

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

C002 - Cooling Unit Water Heater, CU003 -Washer Drying Oven, CU005 - Drying Oven

Unit	Unit ID	Total Fuel Firing Capacity (BTU/hr)	Natural Gas Emission Factors (lb/10 ⁶ ft ³) ¹						
			1.9	7.6	0.6	100	5.5	84	5.00E-04
			Potential Emissions (tons/yr)						
			PM	PM-10	SOx	NOx	VOC	CO	Pb
Parts Washer Water Heater	CU002*	2,000,000	0.017	0.067	0.005	0.876	0.048	0.736	4.38E-06
Cooling Unit Washer Drying Ov	CU003*	1,500,000	0.012	0.050	0.004	0.657	0.036	0.552	3.29E-06
Cooling Unit Drying Oven	CU005*	1,500,000	0.012	0.050	0.004	0.657	0.036	0.552	3.29E-06
Total			0.042	0.166	0.013	2.190	0.120	1.840	0.00

Unit	Unit ID	Total Fuel Firing Capacity (BTU/hr)	Natural Gas Emission Factors (lb/10 ⁶ ft ³) ¹						
			2.10E-03	7.50E-02	1.8	3.40E-03	1.10E-03	1.40E-03	2.10E-03
			Potential Emissions (tons/yr)						
			Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Parts Washer Water Heater	CU002*	2,000,000	1.84E-05	6.57E-04	0.016	2.98E-05	9.64E-06	1.23E-05	1.84E-05
Cooling Unit Washer Drying Ov	CU003*	1,500,000	1.38E-05	4.93E-04	0.012	2.23E-05	7.23E-06	9.20E-06	1.38E-05
Cooling Unit Drying Oven	CU005*	1,500,000	1.38E-05	4.93E-04	0.012	2.23E-05	7.23E-06	9.20E-06	1.38E-05
Total		5,000,000	4.60E-05	1.64E-03	3.94E-02	7.46E-05	2.41E-05	3.07E-05	4.60E-05

Notes:

¹Emission factors from EPA Publication AP-42, Fifth edition (7/98 revision), Table 1.4-1, Table 1.4-2, Table 1.4-3, & Table 1.4-4

Please see page 4 of 6 TSD App A for methodology used for emission calculations for combustion units CU002, CU003 and CU005

CU004 - Cooling Unit Paint Dipping Line

Maximum Capacity (units painted/hr)	Bottleneck Capacity (units painted/hr) ¹	Paint Usage (mL/unit) ²	Potential Paint Usage (Maximum capacity)		Potential Paint Usage (Bottleneck capacity)		VOC Content (lbs/gal) ³	PTE VOC Bottleneck capacity			PTE of VOC (Maximum capacity)	
			(gals/hr)	(gals/yr)	(gals/hr)	(gals/yr)		(lbs/hr)	lbs/day	tons/yr	lbs/day	tons/yr
301	79	20.5	1.6	14274.3	0.4	3746.4	0.74	0.31	7.56	1.38	28.79	5.25

Notes:

¹The maximum rated capacity of the cooling unit paint dipping line is 301 units per hour. However due to production bottleneck, the maximum capacity of the paint dipping line is limited to only 79 units/hour because the cooling unit welding stations can only produce a total of 79 units per hour. The cooling unit welding stations are the sole source of units that are painted by the cooling unit paint dipping line.

The source operates eight hours day and 5 days a week

²Per unit paint usage equals: 0.2787m²/unit (cooling unit surface area) * 1 L/13.6 m² (paint coverage) * 1000 mL/L = 20.5 mL/unit

³The paint (Becker Black Primer EJ652-7001) is diluted 40% by volume with water. VOC content is the as applied diluted VOC content.

Methodology:

PTE VOC tons/ yr =[(units painted / hr) * [(Paint usage mL/unit) / 3785.1 mL/gal] * VOC content (lbs/gal)] * 8760 /2000

Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Fin-Pack Production Line

Company Name: Dometic LLC
Address City IN Zip: 2310 Industrial Parkway, Elkhart, Indiana
MSOP Permit Number: 039-28368-00699
Minor Permit Revision No: 039-29277-00699
Reviewer: Swarna Prabha

Maximum Rated Capacity (units stamped/hr)	Ethanol Usage (mL/unit) ¹	Potential Ethanol Usage		Ethanol Density (lbs/gal)	Pollutant Content (% Weight)		PTE	
		(gals/hr)	(gals/yr)				(lbs/hr)	tons/yr
80	24.7	0.52	4,572.8	6.60	VOC	100	3.45	15.09
					Methanol	4.3	0.15	0.65
					MIBK	0.9	0.03	0.14

Notes:

¹Per unit ethanol usage is based on maximum usage information provided by another Dometic facility that previously operated this fin-pack stamping equipment. The stamping equipment is being moved from that facility to Dometic's Elkhart facility and will be operated in the same manner.

Univar Ethanol Vanzol A-1 will be used as a stamping lubricant to eliminate the need for post-stamping metal cleaning.

Methodology:

PTE VOC tons / yr = [(units stamped / hr) * [(Ethanol usage mL/unit) / 3785.41 mL/gal] * Ethanol Density (lbs/gal)] * 8760 /2000

PTE Methanol tons / yr = [(units stamped / hr) * [(Ethanol usage mL/unit) / 3785.41 mL/gal] * Ethanol Density (lbs/gal)* Methanol % weight] * 8760 /2000

PTE MIBK tons / yr = [(units stamped / hr) * [(Ethanol usage mL/unit) / 3785.41 mL/gal] * Ethanol Density (lbs/gal)* MIBK % weight] * 8760 /2000

FP002 - Fin-pack Paint Dipping Line using FONTETHERMIS 90 clear paint

Maximum Capacity (units painted/hr) ¹	Bottleneck Capacity (units painted/hr) ¹	Paint Usage (mL/unit) ²	Potential Paint Usage (Maximum Capacity)		Potential Paint Usage (Bottleneck Capacity)		Paint Density (lbs/gallon)	Pollutant Content (%) Weight	PTE VOC (Bottleneck Capacity)			PTE VOC (Maximum Capacity)		
			(gals/hr)	(gals/yr)	(gals/hr)	(gals/yr)			(lbs/hr)	lbs/day	tons/yr	lbs/day	tons/yr	
96	80	17	0.43	3776.69	0.36	3147.24	8.34	VOC	24	0.72	5.75	3.15	20.71	11.34

Notes:

The source operates eight hours day and 5 days a week

¹Maximum rated capacity of the fin-pack paint dipping line is 96 units/hour. However, but due to a production bottleneck, the maximum capacity of the paint dipping bline is limited to 80 units/hour because the fin-pack stamping line can only produce 80 units/hour. The fin-pack stamping line is the sole source of units that are painted by the fin-pack paint dipping line.

²Per unit paint usage is based on usage information provided by another Dometic facility that previously operated the fin-pack paint dipping equipment. The paint dipping equipment is being moved from that facility to Dometic's Elkhart facility and will be operated in the same manner.

Methodology:

PTE VOC tons/ yr = [(units painted / hr) * [(Paint usage mL/unit) / 3785.1 mL/gal] * Paint Density (lbs/gal) * % weight VOC content] * 8760 /2000

FP003 - Fin-pack Drying Oven

Unit	Unit ID	Total Fuel Firing Capacity (BTU/hr)	Natural Gas Emission Factors (lb/10 ⁶ ft ³) ¹						
			1.9	7.6	0.6	100	5.5	84	5.00E-04
			Potential Emissions (tons/yr)						
			PM	PM-10	SOx	NOx	VOC	CO	Pb
Fin-pack Drying Oven	FP003	1,000,000	0.008	0.033	0.003	0.438	0.024	0.368	2.19E-06

Unit	Unit ID	Total Fuel Firing Capacity (BTU/hr)	Natural Gas Emission Factors (lb/10 ⁶ ft ³) ¹						
			2.10E-03	7.50E-02	1.8	3.40E-03	1.10E-03	1.40E-03	2.10E-03
			Potential Emissions (tons/yr)						
			Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Fin-pack Drying Oven	FP003	1,000,000	9.20E-06	3.29E-04	7.88E-03	1.49E-05	4.82E-06	6.13E-06	9.20E-06

Notes:

¹Emission factors from EPA Publication AP-42, Fifth edition (7/98 revision), Table 1.4-1, Table 1.4-2, Table 1.4-3, & Table 1.4-4

Potential emissions based on operating at maximum rated capacity for 8,760 hours per year .

1. *PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

2. There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5

3. **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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

All emission factors are based on normal firing.



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: Thomas Christophel
Dometic, LLC
2310 Industrial Pkwy
Elkhart, IN 46516

DATE: July 7, 2010

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

SUBJECT: Final Decision
Minor Permit Revision
039-29277-00699

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:
Abraham Kloze - HRP Associates, Inc.
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 7/7/2010 Dometic LLC 039-29277-00699 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
6		Abraham Kloze HRP Associates, Inc. 197 Scott Swamp Road Farmington CT 06032 (Consultant)										
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