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: March 15, 2011

RE: Keystone RV Company / 039-29911-00620

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot12/3/07

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Mr. Tim Edwards
Keystone Recreational Vehicle Company
P.O. Box 2000
Goshen, IN 46527

March 15, 2011

Re: 039-29911-00620
First Administrative Amendment to
Part 70 Permit No.: 039-28445-00620

Dear Mr. Edwards,

Keystone Recreational Vehicle Company was issued a permit on February 4, 2010 for a stationary recreational vehicle (RV) manufacturing operation. A letter requesting the relocation of three existing plants and the addition of four space heaters was received on November 22, 2010. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

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 Denny Vendt, at (800) 451-6027, and ask for Denny Vendt or extension 4-5300, or dial (317) 234-5300.

Sincerely,

Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments
DFR/dmv

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Compliance and Enforcement Branch

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Part 70 Operating Permit
OFFICE OF AIR QUALITY

Keystone Recreational Vehicle Company
2642 Hackberry Drive
Goshen, Indiana 46526

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-28445-00620	
Issued by: *Original document signed by* Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 4, 2010 Expiration Date: February 4, 2015
First Administrative Amendment.: 039-29911-00620	
Issued by: Donald F. Robin Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 15, 2011 Expiration Date: February 4, 2015

TABLE OF CONTENTS

A. SOURCE SUMMARY

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
A.2 Source Definition [326 IAC 2-7-1(22)]
A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

B. GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.3 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
B.4 Term of Conditions [326 IAC 2-1.1-9.5]
B.5 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
B.6 Severability [326 IAC 2-7-5(5)]
B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.9 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
B.12 Emergency Provisions [326 IAC 2-7-16]
B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
B.15 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
B.21 Source Modification Requirement [326 IAC 2-7-10.5]
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(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]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5 Fugitive Dust Emissions [326 IAC 6-4]

C.6 Stack Height [326 IAC 1-7]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]
C.8 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 1 - 2525 Linden Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.1.2 VOC Limitations [326 IAC 2-2]
D.1.3 HAP Limitations [326 IAC 2-4.1]
D.1.4 Particulate [326 IAC 6-3-2]
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.1.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.1.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.9 Visible Emissions Notations
D.1.10 Parametric Monitoring
D.1.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.1.12 Record Keeping Requirements
D.1.13 Reporting Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 2 - 2478 Davis Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.2.2 VOC Limitations [326 IAC 2-2]
D.2.3 HAP Limitations [326 IAC 2-4.1]
D.2.4 Particulate [326 IAC 6-3-2]
D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.2.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.2.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.2.9 Visible Emissions Notations
D.2.10 Parametric Monitoring
D.2.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.2.12 Record Keeping Requirements
D.2.13 Reporting Requirements.

D.3 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 3 - 2855 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.3.2 VOC Limitations [326 IAC 2-2]
D.3.3 HAP Limitations [326 IAC 2-4.1]
D.3.4 Particulate [326 IAC 6-3-2]
D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.3.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.3.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.3.9 Visible Emissions Notations
D.3.10 Parametric Monitoring
D.3.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.3.12 Record Keeping Requirements
D.3.13 Reporting Requirements

D.4 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 4 - 2860 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.4.2 VOC Limitations [326 IAC 2-2]
D.4.3 HAP Limitations [326 IAC 2-4.1]
D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.4.6 Particulate [326 IAC 6-3-2]
D.4.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.4.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.4.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.4.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.4.11 Visible Emissions Notations
D.4.12 Parametric Monitoring
D.4.13 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.4.14 Record Keeping Requirements
D.4.15 Reporting Requirements

D.5 EMISSIONS UNIT OPERATION CONDITIONS ..... Plants 6 - 2642 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.5.1 VOC Limitations [326 IAC 2-2]
D.5.2 HAP Limitations [326 IAC 2-4.1]
D.5.3 Particulate [326 IAC 6-3-2]
D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.5.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.5.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.5.7 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.5.8 Visible Emissions Notations
D.5.9 Parametric Monitoring
D.5.10 Broken or Failed Bag Detection [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.5.11 Record Keeping Requirements
D.5.12 Reporting Requirements

D.6 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 7 - 2530 Linden Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.6.2 VOC Limitations [326 IAC 2-2]
D.6.3 HAP Limitations [326 IAC 2-4.1]
D.6.4 Particulate [326 IAC 6-3-2]
D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.6.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.6.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.6.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.6.9 Visible Emissions Notations
D.6.10 Parametric Monitoring
D.6.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.6.12 Record Keeping Requirements
D.6.13 Reporting Requirements

D.7 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 8 - 2425 Davis Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.7.1 VOC Limitations [326 IAC 2-2]
D.7.2 HAP Limitations [326 IAC 2-4.1]
D.7.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.7.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]
D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.7.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.7.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Record Keeping and Reporting Requirements [326 IAC 2 8 4(3)]
D.7.8 Record Keeping Requirements
D.7.9 Reporting Requirements

D.8 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 41 - 3313 Corrie Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.8.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.8.2 Volatile Organic Compounds [326 IAC 8-2-9]
D.8.3 VOC Limitations [326 IAC 2-2]
D.8.4 HAP Limitations [326 IAC 2-4.1]
D.8.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.8.6 Particulate [326 IAC 6-3-2]
D.8.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.8.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.8.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.8.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.8.11 Visible Emissions Notations
D.8.12 Parametric Monitoring
D.8.13 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.8.14 Record Keeping Requirements
D.8.15 Reporting Requirements

D.9 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 14 - 2442 Davis Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.9.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.9.2 VOC Limitations [326 IAC 2-2]
D.9.3 HAP Limitations [326 IAC 2-4.1]
D.9.4 Volatile Organic Compounds [326 IAC 8-2-9]
D.9.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

D.9.6 Particulate [326 IAC 6-3-2]
D.9.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.9.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.9.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.9.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.9.11 Visible Emissions Notations
D.9.12 Parametric Monitoring
D.9.13 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.9.14 Record Keeping Requirements
D.9.15 Reporting Requirements

D.10 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 19 - 2775 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.10.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.10.2 VOC Limitations [326 IAC 2-2]
D.10.3 HAP Limitations [326 IAC 2-4.1]
D.10.4 Volatile Organic Compounds [326 IAC 8-2-9]
D.10.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.10.6 Particulate [326 IAC 6-3-2]
D.10.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.10.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.10.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.10.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.10.11 Visible Emissions Notations
D.10.12 Parametric Monitoring [40 CFR 64]
D.10.13 Broken or Failed Bag Detection [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.10.14 Record Keeping Requirements
D.10.15 Reporting Requirements

D.11 EMISSIONS UNIT OPERATION CONDITIONS..... Plant 20 - 2769 Elders Drive

Emission Limitations and Standards [326 IAC 2 7 5(1)]
D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.11.2 VOC Limitations [326 IAC 2-2]
D.11.3 HAP Limitations [326 IAC 2-4.1]
D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.11.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.11.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.11.7 Record Keeping Requirements
D.11.8 Reporting Requirements

D.12 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 29 - 2462 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.12.1 Particulate [326 IAC 6-3-2]
D.12.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.12.3 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.12.4 Visible Emissions Notations
D.12.5 Parametric Monitoring
D.12.6 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.12.7 Record Keeping Requirements

D.13 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 31 - 2642 Hackberry Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.13.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.13.2 VOC Limitations [326 IAC 2-2] [326 IAC 2-3]
D.13.3 HAP Limitations [326 IAC 2-4.1]
D.13.4 Particulate [326 IAC 6-3-2]
D.13.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.13.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.13.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.13.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.13.9 Visible Emissions Notations
D.13.10 Parametric Monitoring
D.13.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.13.12 Record Keeping Requirements
D.13.13 Reporting Requirements

D.14 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 50 - 2420 Davis Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.14.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.14.2 VOC Limitations [326 IAC 2-2]
D.14.3 HAP Limitations [326 IAC 2-4.1]
D.14.4 Volatile Organic Compounds [326 IAC 8-2-9]
D.14.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.14.6 Particulate [326 IAC 6-3-2]
D.14.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.14.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.14.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.14.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.14.11 Visible Emissions Notations
D.14.12 Parametric Monitoring
D.14.13 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.14.14 Record Keeping Requirements
D.14.15 Reporting Requirements

D.15 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 17- 2833 Sourwood Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.15.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.15.2 VOC Limitations [326 IAC 2-2]
D.15.3 HAP Limitations [326 IAC 2-4.1]
D.15.4 Particulate [326 IAC 6-3-2]
D.15.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.15.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.15.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.15.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.15.9 Visible Emissions Notations
D.15.10 Parametric Monitoring
D.15.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.15.12 Record Keeping Requirements
D.15.13 Reporting Requirements

D.16 EMISSIONS UNIT OPERATION CONDITIONS .....Plant 311 - 2400 East Kercher Drive

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.16.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.16.2 VOC Limitations [326 IAC 2-2]
D.16.3 HAP Limitations [326 IAC 2-4.1]
D.16.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.16.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.16.6 Particulate [326 IAC 6-3-2]
D.16.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.16.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.16.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.16.10 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.16.11 Visible Emissions Notations
D.16.12 Parametric Monitoring
D.16.13 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.16.14 Record Keeping Requirements
D.16.15 Reporting Requirements

D.17 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 701 - 2639 Lincoln Way East

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.17.1 Volatile Organic Compounds (VOC [326 IAC 8-2-12]
D.17.2 VOC Limitations [326 IAC 2-2]
D.17.3 HAP Limitations [326 IAC 2-4.1]
D.17.4 Particulate [326 IAC 6-3-2]
D.17.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.17.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.17.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.17.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.17.9 Visible Emissions Notations
D.17.10 Parametric Monitoring
D.17.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.17.12 Record Keeping Requirements
D.17.13 Reporting Requirements

D.18 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 702 - 2639 Lincoln Way East

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.18.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.18.2 VOC Limitations [326 IAC 2-2]
D.18.3 HAP Limitations [326 IAC 2-4.1]
D.18.4 Particulate [326 IAC 6-3-2]
D.18.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.18.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.18.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.18.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.18.9 Visible Emissions Notations
D.18.10 Parametric Monitoring
D.18.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]
D.18.12 Record Keeping Requirements
D.18.13 Reporting Requirements

D.19 EMISSIONS UNIT OPERATION CONDITIONS ..... Plant 703 - 2639 Lincoln Way East

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.19.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.19.2 VOC Limitations [326 IAC 2-2]
D.19.3 HAP Limitations [326 IAC 2-4.1]
D.19.4 Particulate [326 IAC 6-3-2]
D.19.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.19.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.19.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.19.8 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.19.9 Visible Emissions Notations
D.19.10 Parametric Monitoring
D.19.11 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.19.12 Record Keeping Requirements
D.19.13 Reporting Requirements

Certification Form
Emergency Occurrence Form
Quarterly Report Forms
Quarterly Deviation and Compliance Monitoring Report Form

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, A.3 through A.4 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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recreational vehicle (RV) manufacturing operation.

Source Address:	2642 Hackberry Drive, Goshen, Indiana 46526
General Source Phone Number:	(574)535-1974
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 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 Part 70 Source Definition [326 IAC 2-7-1(22)]

The Source Definition from the previous Federally Enforceable State Operating Permit (F039-23645-00620, issued on January 16, 2009 was incorporated into this permit as follows:

This stationary RV manufacturing company consists of sixteen (16) buildings with a total of twenty-two (22) plant designations:

(a) Plant 1 is located at 2525 Linden Drive, Goshen, Indiana;

(b) Plant 2 is located at 2478 Davis Drive, Goshen, Indiana;

(c) Plant 3 is located at 2855 Hackberry Drive, Goshen, Indiana;

(d) Plant 4 is located at 2860 Hackberry Drive, Goshen, Indiana;

(e) Plant 6 is located at 2642 Hackberry Drive, Goshen Indiana;

(f) Plant 7 is located at 2530 Linden Drive, Goshen, Indiana;

(g) Plant 8 is located at 2425 Davis Drive, Goshen, Indiana;

(h) Plant 14 is located at 2442 Davis Drive, Goshen, Indiana;

(i) Plant 17 is located at 2833 Sourwood Drive, Goshen, Indiana;

(j) Plant 18 is located at 2719 Hackberry Drive, Goshen, Indiana;

(k) Plant 19 is located at 2775 Hackberry Drive, Goshen, Indiana;

(l) Plant 20 is located at 2769 Elders Drive, Goshen, Indiana;

(m) Plant 23 is located at 2694 Hackberry Drive, Goshen, Indiana;

(n) Plant 27 is located at 2769 Elders Drive, Goshen, Indiana;

(o) Plant 29 is located at 2642 Hackberry Drive, Goshen, Indiana;

(p) Plant 31 is located at 2642 Hackberry Drive, Goshen, Indiana;

(q) Plant 41 is located at 3313 Corrie Drive, Goshen, Indiana;

(r) Plant 50 is located at 2420 Davis Drive, Goshen, Indiana;

(s) Plant 311 is located at 2400 East Kercher Drive, Goshen, Indiana;

(t) Plant 701 is located at 2639 Lincoln Way East, Goshen, Indiana;

(u) Plant 702 is located at 2639 Lincoln Way East, Goshen, Indiana; and

(v) Plant 703 is located at 2639 Lincoln Way East, Goshen, Indiana;

These plants are located on contiguous or adjacent properties, have the same SIC codes and are under common control, therefore they are considered one (1) source, as defined by 326 IAC 2-7-1(22).

A.3 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

Plant 1 - 2525 Linden Drive [Section D.1]

(a) One (1) woodworking operation, identified as WW 1, constructed in 2002, with a maximum throughput of 3,128 pounds per hour, controlled by dust collectors DC1-1 through DC7-1.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 1, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 2 - 2478 Davis Drive [Section D.2]

(a) One (1) woodworking operation, identified as WW 2, constructed in 2004, with a maximum throughput of 2,705 pounds per hour, controlled by dust collectors DC1-2 through DC7-2.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 2, constructed in 2004, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and using less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 3 - 2855 Hackberry Drive [Section D.3]

(a) One (1) woodworking operation, identified as WW 3, constructed in 2003, with a maximum throughput of 2,720 pounds per hour, controlled by dust collectors DC1-3 through DC7-3.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 3, constructed in 2003, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 4 - 2860 Hackberry Drive [Section D.4]

(a) One (1) woodworking operation, identified as WW 4, constructed in 2002, with a maximum throughput of 3,415.5 pounds per hour, controlled by dust collectors DC1-4 through DC7-4.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 4, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plants 6 - 2642 Hackberry Drive [Section D.5]

(a) One (1) woodworking operation, identified as WW 6, constructed in 1998 and 1999, with a maximum throughput of 161.25 pounds per hour, controlled by dust collectors DC1-6 and DC2-6.

(b) One (1) surface coating operation, for adhesive application, identified as AA 6, constructed in 2004, with a maximum throughput of 344 wood pieces per hour, utilizing brush application to coat wood and fabric.

Plant 7 - 2530 Linden Drive [Section D.6]

(a) One (1) woodworking operation, identified as WW 7, constructed in 2002, with a maximum throughput of 2,910.32 pounds per hour, controlled by dust collectors DC1-3 through DC7-3.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 7, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 8 - 2425 Davis Drive [Section D.7]

(a) One (1) service repair operation, identified as SR 8, constructed in 2006, with a maximum throughput of 0.10 RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(b) One (1) touch-up painting station, identified as TP 8, constructed in 2006, with a maximum throughput of 0.10 RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal and plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) parts washer, identified as PW-8, constructed in 2006, with an annual solvent throughput of 100 gallons.

Plant 41 - 3313 Corrie Drive [Section D.8]

(a) One (1) woodworking operation, identified as WW 41, constructed in 1997, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-41 through DC7-41.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 41, constructed in 1997, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 14 - 2442 Davis Drive [Section D.9]

(a) One (1) woodworking operation, identified as WW 14, constructed in 2005, with a maximum throughput of 2,975.2 pounds per hour, controlled by dust collectors DC1-14 through DC7-14.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 14, constructed in 2005, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 19 - 2775 Hackberry Drive [Section D.10]

(a) One (1) woodworking operation, identified as WW 19, constructed in 2006, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-2 through DC7-2.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 19, constructed in 2006, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 20 - 2769 Elders Drive [Section D.11]

Five (5) lamination lines (identified as L1 through L5), constructed in 2007, used to manufacture exterior walls. Each lamination line has a maximum throughput capacity of 343.8 pounds of finished product per hour; and utilizes roll coating application.

Plant 23 - 2694 Hackberry Drive

Four (4) laminating machines, identified as S1 through S4, constructed in 2005, utilizing roll coating for coating application, with a maximum throughput of 40 sidewalls per hour.

Plant 29 - 2642 Hackberry Drive [Section D.12]

One (1) woodworking operation, identified as WW 29, constructed in 2004, with a maximum throughput of 6,464 pounds per hour, controlled by dust collectors DC1-29 and DC2-29.

Plant 31 - 2642 Hackberry Drive [Section D.13]

(a) One (1) woodworking operation, identified as WW 31, constructed in 1996, with a maximum throughput of 2,139.2 pounds per hour, controlled by dust collectors DC1-31 through DC7-31.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 31, constructed in 1996, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 50 - 2420 Davis Drive [Section D.14]

(a) One (1) woodworking operation, identified as WW 50, constructed in 2004, with a maximum throughput of 3,278.5 pounds per hour, controlled by dust collectors DC1-50 through DC7-50.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 50, constructed in 2004, with a maximum throughput of four (4) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 17 - 2833 Sourwood Drive [Section D.15]

(a) One (1) woodworking operation, identified as WW 17, constructed in 2003, with a maximum throughput of 2,114.6 pounds per hour, controlled by dust collectors DC1-17 through DC7-17.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 17, constructed in 2003, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 311 - 2400 East Kercher Drive [Section D.16]

(a) One (1) woodworking operation, identified as WW 311, constructed in 2004, with a maximum throughput of 3,344.7 pounds per hour, controlled by dust collectors DC1-311 through DC7-311.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 311, constructed in 2004, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 701 - 2639 Lincoln Way East [Section D.17]

(a) One (1) woodworking operation, identified as WW 701, approved in 2009 for construction, with a maximum throughput of 2720 pounds per hour, controlled by dust collector DC1-701 through DC5-701.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 701, approved in 2009 for construction, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 702 - 2639 Lincoln Way East [Section D.18]

(a) One (1) woodworking operation, identified as WW 702, approved in 2009 for construction, with a maximum throughput of 2720 pounds per hour, controlled by dust collectors DC1-702 through DC5-702.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application to coat wood and meta and emitting less than fifteen (15) pounds per day VOC for metal coating l.

(d) One (1) assembly operation, identified as ALO 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

Plant 703 - 2639 Lincoln Way East [Section D.19]

(a) One (1) woodworking operation, identified as WW 703, approved in 2009 for construction, with a maximum throughput of 3,400 pounds per hour, controlled by dust collectors DC1-703 through DC5-703.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

Plant 1 - 2525 Linden Drive [Section D.1]

(a) Three (3) natural gas-fired space heaters, identified as TC1-1 through TC3-1, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-1, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 1, constructed in 2002, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting operation, identified as MPE 1, constructed in 2002, with a maximum throughput of 269.1 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 2 - 2478 Davis Drive [Section D.2]

(a) Three (3) natural gas-fired space heaters, identified as TC1-2 through TC3-2, constructed in 2004, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-2, constructed in 2004, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 2, constructed in 2004, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 2, constructed in 2004, with a maximum throughput of 330 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 3 - 2855 Hackberry Drive [Section D.3]

(a) Three (3) natural gas-fired space heaters, identified as TC1-3 through TC3-3, constructed in 2003, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-3, constructed in 2003, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 3, constructed in 2003, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 3, constructed in 2003, with a maximum throughput of 234 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 4 - 2860 Hackberry Drive [Section D.4]

(a) Three (3) natural gas-fired space heaters, identified as TC1-4 through TC3-4, constructed in 2004, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-4, constructed in 2004, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 4, constructed in 2002, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 4, constructed in 2002, with a maximum throughput of 417 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 6 - 2642 Hackberry Drive [Section D.5]

(a) Three (3) natural gas-fired space heaters, identified as TC1-6 through TC3-6, constructed in 1998, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-6, constructed in 1998, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) miscellaneous woodworking operation, identified as MPE 6, constructed in 1998, with a maximum throughput of 156.32 lbs of wood pieces per hour.

Plant 7 - 2530 Linden Drive [Section D.6]

(a) Three (3) natural gas-fired space heaters, identified as TC1-7 through TC3-7, constructed in 2002, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-7, constructed in 2002, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 7, constructed in 2002, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 7, constructed in 2002, with a maximum throughput of 250.4 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 8 - 2425 Davis Drive [Section D.7]

(a) Three (3) natural gas-fired space heaters, identified as TC1-8 through TC3-8, constructed in 2006, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-8, constructed in 2006, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 8, constructed in 2006, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 0.10 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.05 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

Plant 41 - 3313 Corrie Drive [Section D.8]

(a) Three (3) natural gas-fired space heaters, identified as TC1-41 through TC3-41, approved in 2011 for construction, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-41, approved in 2011 for construction, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 41, constructed in 1997, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 41, constructed in 1997, with a maximum throughput of 348.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 14 - 2442 Davis Drive [Section D.9]

(a) Three (3) natural gas-fired space heaters, identified as TC1-14 through TC3-14, constructed in 2005, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-14, constructed in 2005, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 14, constructed in 2005, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 14, constructed in 2005, with a maximum throughput of 363.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 18 - 2719 Hackberry Drive

(a) One (1) natural gas-fired space heater, identified as TC1-18, constructed in 2004, with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-18, constructed in 2004, with a maximum heat input of 0.15 million British thermal units per hour.

Plant 19 - 2775 Hackberry Drive [Section D.10]

(a) Three (3) natural gas-fired space heaters, identified as TC1-19, constructed in 2003, with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-19, constructed in 2003, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 19, constructed in 2006, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 19, constructed in 2006, with a maximum throughput of 348.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 20 - Emission Units - 2769 Elders Drive [Section D.11]

(a) Twenty-eight (28) metal inert gas (MIG) welding stations, each with a maximum wire consumption rate of 1.71 pounds per hour.

(b) Two (2) table saws used to cut styrofoam, identified as MPE 20.

(c) Twenty-six (26) natural gas-fired space heaters, identified as R1-20 through R26-20, constructed in 2004, each with a maximum heat input of 0.15 million British thermal units per hour.

(d) Two (2) natural gas-fired space heaters, identified as SH1-20 and SH2-20, constructed in 2004, each with a maximum heat input of 0.25 million British thermal units per hour.

Plant 23 - Emission Units - 2694 Hackberry Drive

(a) One (1) natural gas-fired space heater, identified as R1, constructed in 2005, with a maximum heat input of 1.5 million British thermal units per hour.

(b) One (1) welding and cutting operation, identified as WC 23, constructed in 2005, including seventy (70) metal inert gas (MIG) welders, with a maximum throughput of 1.2 lb electrode per hour.

Plant 27 - Emission Units - 2769 Elders Drive

(a) One (1) natural gas-fired space heater, identified as R1-27, constructed in 2004, with a maximum heat input of 2.5 million British thermal units per hour.

(b) Two (2) natural gas-fired space heater, identified as R2-27 and R3-27, constructed in 2004, with a maximum heat input of 1.5 million British thermal units per hour.

(c) One (1) natural gas-fired space heater, identified as SH1-27, constructed in 2004, with a maximum heat input of 0.15 million British thermal units per hour.

Plant 29 - 2642 Hackberry Drive [Section D.12]

(a) One (1) miscellaneous woodworking operation, identified as MPE 29, constructed in 2004, with a maximum throughput of 6,450 lbs of wood parts per hour.

Plant 31 - 2642 Hackberry Drive [Section D.13]

(a) Three (3) natural gas-fired space heaters, identified as TC1-31 through TC3-31, constructed in 1996, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) Two (2) natural gas-fired space heaters, identified as SH1-31 and SH2-31, constructed in 1996, each with a maximum heat input of 0.50 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 31, constructed in 1996, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 31, constructed in 1996, with a maximum throughput of 261.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 50 - 2420 Davis Drive [Section D.14]

(a) Three (3) natural gas-fired space heaters, identified as TC1-50 through TC3-50, constructed in 2006, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-50, constructed in 2006, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 50, constructed in 2004, including two (2) metal inert gas (MIG) welders, with a maximum throughput of 1.0 lb electrode per hour each, and two (2) stick welders, with a maximum throughput of 0.50 lbs electrode per hour each, and two (2) oxyacetylene cutting torches.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 50, constructed in 2004, with a maximum throughput of 400 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 17 - 2833 Sourwood Drive [Section D.15]

(a) Three (3) natural gas-fired space heaters, identified as TC1-17 through TC3-17, constructed in 1997, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-17, constructed in 1997, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 17, constructed in 2003, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE 17, constructed in 2003, with a maximum throughput of 258.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 311 - 2400 East Kercher Drive [Section D.16]

(a) Three (3) natural gas-fired space heaters, identified as TC1-311 through TC3-311, constructed in 2002, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-311, constructed in 2002, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC 311, constructed in 2004, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting/machining operation, identified as MPE 311, constructed in 2004, with a maximum throughput of 408.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 701 - 2639 Lincoln Way East [Section D.17]

(a) One (1) welding and cutting operation, identified as WC 701, approved in 2009 for construction, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(b) One (1) miscellaneous cutting or machining operation, identified as MPE 701, approved in 2009 for construction, with a maximum throughput of 200.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 702 - 2639 Lincoln Way East [Section D.18]

(a) One (1) welding and cutting operation, identified as WC 702, approved in 2009 for construction, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(b) One (1) miscellaneous cutting or machining operation, identified as MPE 702, approved in 2009 for construction, with a maximum throughput of 200.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

Plant 703 - 2639 Lincoln Way East [Section D.19]

(a) One (1) welding and cutting operation, identified as WC 703, approved in 2009 for construction, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(b) One (1) miscellaneous cutting or machining operation, identified as MPE 703, approved in 2009 for construction, with a maximum throughput of 250.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

(c) Six (6) natural gas-fired space heaters, identified as TC1-701 through TC6-701, approved in 2009 for construction, each with a maximum heat input of 0.58 million British thermal units per hour.

(d) One (1) natural gas-fired space heater, identified as SH1-701, approved in 2009 for construction, with a maximum heat input of 0.25 million British thermal units per hour.

All Facilities

(a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(b) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons, including:

(1) Tank T1, with a maximum capacity of 1,000 gallons, for the storage of gasoline.

(2) Tank T2, with a maximum capacity of 500 gallons, for the storage of diesel fuel.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) 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 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T039-28445-00620, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.4 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.5 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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.6 Severability [326 IAC 2-7-5(5)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(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.9 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report 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 annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(c) 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(d) 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.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T039-28445-00620 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.15 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 nine (9) months 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 2-7 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.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [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 2-7-5(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 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.3 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.4 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.5 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). Because this condition was previously in a FESOP, it is now federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-6(1)]

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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 1 - 2525 Linden Drive

(a) One (1) woodworking operation, identified as WW 1, constructed in 2002, with a maximum throughput of 3,128 pounds per hour, controlled by dust collectors DC1-1 through DC7-1.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 1, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastic, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 1, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 1) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 1), the subfloor installation operations (SF 1), the assembly operations (ALO 1), the repair operations (RO 1), the touch-up stations (TP 1), and the final finish operations (FF 1), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.2 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.1.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 1), the subfloor installation operations (SF 1), the assembly operations (ALO 1), the repair operations (RO 1), the touch-up stations (TP 1), and the final finish operations (FF 1), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.2 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.53 pounds per hour when operating at a process weight rate of 3,128 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

(a) Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.1.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.1.8 Particulate Control

(a) In order to comply with Condition D.1.4, the baghouses DC1-1 through DC7-1 for particulate control shall be in operation and control emissions from the woodworking operation (WW 1) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 1), at least once per week when the woodworking process (WW 1) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.1.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in paragraph (b) of Conditions D.1.6 and D.1.7, then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.1.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that week).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.1.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.2 and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 2 - 2478 Davis Drive

(a) One (1) woodworking operation, identified as WW 2, constructed in 2004, with a maximum throughput of 2,705 pounds per hour, controlled by dust collectors DC1-2 through DC7-2.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 2, constructed in 2004, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastic, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 2, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 2) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 2), the subfloor installation operations (SF 2), the assembly operations (ALO 2), the repair operations (RO 2), the touch-up stations (TP 2), and the final finish operations (FF 2), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1, and D.3 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.2.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 2), the subfloor installation operations (SF 2), the assembly operations (ALO 2), the repair operations (RO 2), the touch-up stations (TP 2), and the final finish operations (FF 2), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 and D.3 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.2.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.02 pounds per hour when operating at a process weight rate of 2,705 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.2.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.2.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Conditions D.2.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.2.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.2.8 Particulate Control

(a) In order to comply with Condition D.2.4, the baghouses DC1-2 through DC7-2 for particulate control shall be in operation and control emissions from the woodworking operation (WW 2) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.2.9 Visible Emissions Notations

(a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(b) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(d) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 2), at least once per week when the woodworking process (WW 2) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.2.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.2.2 and D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in paragraph (b) of Conditions D.2.6 and D.2.7, then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.2.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.2.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.2.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.2 and D.2.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 3 - 2855 Hackberry Drive

(a) One (1) woodworking operation, identified as WW 3, constructed in 2003, with a maximum throughput of 2,720 pounds per hour, controlled by dust collectors DC1-3 through DC7-3.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 3, constructed in 2003, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 3, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 3) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.3.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 3), the subfloor installation operations (SF 3), the assembly operations (ALO 3), the repair operations (RO 3), the touch-up stations (TP 3), and the final finish operations (FF 3), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1, D.2, and D.4 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.3.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 3), the subfloor installation operations (SF 3), the assembly operations (ALO 3), the repair operations (RO 3), the touch-up stations (TP 3), and the final finish operations (FF 3), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1, D.2, and D.4 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.3.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.04 pounds per hour when operating at a process weight rate of 2,720 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.3.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.3.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.3.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.3.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.3.8 Particulate Control

(a) In order to comply with Condition D.3.4, the baghouses DC1-3 through DC7-3 for particulate control shall be in operation and control emissions from the woodworking operation (WW 3) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.3.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 3), at least once per week when the woodworking process (WW 3) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.3.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.3.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.3.2 and D.3.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC input as allowed in paragraph (b) of Conditions D.3.6 and D.3.7, then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.3.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.3.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.3.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.3.2 and D.3.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 4 - 2860 Hackberry Drive

(a) One (1) woodworking operation, identified as WW 4, constructed in 2002, with a maximum throughput of 3,415.5 pounds per hour, controlled by dust collectors DC1-4 through DC7-4.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 4, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastic, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 4, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 4) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.4.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 4), the subfloor installation operations (SF 4), the assembly operations (ALO 4), the repair operations (RO 4), the touch-up stations (TP 4), and the final finish operations (FF 4), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1, D.2, D.3, and D.5 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.4.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 4), the subfloor installation operations (SF 4), the assembly operations (ALO 4), the repair operations (RO 4), the touch-up stations (TP 4), and the final finish operations (FF 4), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1, D.2, D.3, and D.5 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor installation operation SF 4) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 4), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the final finish operation (FF 4), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.4.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.87 pounds per hour when operating at a process weight rate of 3,415.5 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.4.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.4.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Conditions D.4.2, D.4.4 and D.4.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.4.2, D.4.4 and D.4.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.4.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.4.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.4.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.4.10 Particulate Control

(a) In order to comply with Condition D.4.6, the baghouses DC1-4 through DC7-4 for particulate control shall be in operation and control emissions from the woodworking operation (WW 4) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.4.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.4.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 4), at least once per week when the woodworking process (WW 4) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.4.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.4.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.4.2 and D.4.3 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.4.2 and D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed Conditions D.4.8(b) and D.4.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with condition D.4.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.4.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.4.4 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(c) To document the compliance status with condition D.4.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.4.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.4.5 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(d) To document the compliance status with Condition D.4.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.4.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.4.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.4.2, D.4.3, D.4.4 and D.4.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 6 - 2642 Hackberry Drive

(a) One (1) woodworking operation, identified as WW 6, constructed in 1998 and 1999, with a maximum throughput of 161.25 pounds per hour, controlled by dust collectors DC1-6 and DC2-6.

(b) One (1) surface coating operation, for adhesive application, identified as AA 6, constructed in 2004, with a maximum throughput of 344 wood pieces per hour, utilizing brush application to coat wood and fabric.

(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 2-7-5(1)]

D.5.1 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the adhesive application operations (AA 6), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1, D.2, D.3, D.4, and D.6 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.5.2 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the adhesive application operations (AA 6), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1, D.2, D.3, D.4, and D.6 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.5.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 0.76 pounds per hour when operating at a process weight rate of 161.3 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.5.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.5.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.5.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.5.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.5.7 Particulate Control

(a) In order to comply with Condition D.5.3, the baghouses DC1-6 and DC2-6 for particulate control shall be in operation and control emissions from the woodworking operation (WW6) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.5.8 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.5.9 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 6), at least once per week when the woodworking process (WW 6) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.5.10 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.5.11 Record Keeping Requirements

(a) To document the compliance status with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.5.1 and D.5.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in of Conditions D.5.5 (b) and D.5.6(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.5.8, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.5.9, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.5.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.5.1 and D.5.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 7 - 2530 Linden Drive

(a) One (1) woodworking operation, identified as WW 7, constructed in 2002, with a maximum throughput of 2,910.32 pounds per hour, controlled by dust collectors DC1-3 through DC7-3.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 7, constructed in 2002, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 7, constructed in 2002, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 7) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.6.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 7), the subfloor installation operations (SF 7), the assembly operations (ALO 7), the repair operations (RO 7), the touch-up stations (TP 7), and the final finish operations (FF 7), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.5 and D.7 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.6.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 7), the subfloor installation operations (SF 7), the assembly operations (ALO 7), the repair operations (RO 7), the touch-up stations (TP 7), and the final finish operations (FF 7), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.5 and D.7 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.6.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.27 pounds per hour when operating at a process weight rate of 2,910.3 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.6.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.6.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.6.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.6.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.6.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.6.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.6.8 Particulate Control

(a) In order to comply with Condition D.6.4, the baghouses DC1-7 through DC7-7 for particulate control shall be in operation and control emissions from the woodworking operation (WW 7) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.6.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.6.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 7), at least once per week when the woodworking process (WW 7) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.6.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.6.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.6.2 and D.6.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.6.2 and D.6.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.6.6(b) and D.6.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.6.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.6.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.6.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.6.2 and D.6.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 8 - 2425 Davis Drive

(a) One (1) service repair operation, identified as SR 8, constructed in 2006, with a maximum throughput of 0.10 RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(b) One (1) touch-up painting station, identified as TP 8, constructed in 2006, with a maximum throughput of 0.10 RV units per hour, utilizing HVLP application and aerosol spray cans to coat metal and plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) parts washer, identified as PW-8, constructed in 2006, with an annual solvent throughput of 100 gallons.

(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 2-7-5(1)]

D.7.1 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the service repair operation, identified as SR 8, and the touch-up painting stations (TP 8), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.6 and D.8 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.7.2 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the service repair operation, identified as SR 8, and the touch-up painting stations (TP 8), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.6 and D.8 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.7.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations (PW 8) constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.7.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.7.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.7.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.7.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.7.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.7.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.7.8 Record Keeping Requirements

(a) To document the compliance status with Conditions D.7.1 and D.7.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.7.1 and D.7.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.7.6(b) and D.7.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.7.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.7.1 and D.7.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.8 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 41 - 3313 Corrie Drive

(a) One (1) woodworking operation, identified as WW 41, constructed in 1997, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-41 through DC7-41.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 41, constructed in 1997, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 41, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.8.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 41) and the final finish operation (FF 41) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.8.2 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor assembly operations SF 41) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.8.3 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 41), the subfloor installation operations (SF 41), the assembly operations (ALO 41), the repair operations (RO 41), the touch-up stations (TP 41), and the final finish operations (FF 41), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.7 and D.9 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.8.4 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 41), the subfloor installation operations (SF 41), the assembly operations (ALO 41), the repair operations (RO 41), the touch-up stations (TP 41), and the final finish operations (FF 41), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.7 and D.9 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.8.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 41), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents to final finish operation (FF 41) to less than 25 tons per twelve (12) consecutive month period, when coating plastic, with compliance determined at the end of each month.

D.8.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.27 pounds per hour when operating at a process weight rate of 2,908 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.8.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.8.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC content and usage limitations contained in Conditions D.8.2, D.8.3 and D.8.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.8.2, D.8.3 and D.8.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.8.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.8.4 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.8.4 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.8.10 Particulate Control

(a) In order to comply with Condition D.8.6, the baghouses DC1-41 through DC7-41 for particulate control shall be in operation and control emissions from the woodworking operation (WW 41) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.8.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.8.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 41), at least once per week when the woodworking process (WW 41) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.8.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.8.14 Record Keeping Requirements

(a) To document the compliance status with condition D.8.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.8.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.8.2 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(b) To document the compliance status with Conditions D.8.3 and D.8.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limits established in Conditions D.8.3 and D.8.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Condition D.8.8(b) and D.8.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VO/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(c) To document the compliance status with condition D.8.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.8.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.1.1 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(d) To document the compliance status with Condition D.8.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.8.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.8.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.8.2 through D.8.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.9 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 14 - 2442 Davis Drive

(a) One (1) woodworking operation, identified as WW 14, constructed in 2005, with a maximum throughput of 2,975.2 pounds per hour, controlled by dust collectors DC1-14 through DC7-14.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 14, constructed in 2005, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 14, constructed in 2005, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.9.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 14) and the final finish operation (FF 14) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.9.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 14), the subfloor installation operations (SF 14), the assembly operations (ALO 14), the repair operations (RO 14), the touch-up stations (TP 14), and the final finish operations (FF 14), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.8 and D.10 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.9.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations including the chassis prep operations (CP 14), the subfloor installation operations (SF 14), the assembly operations (ALO 14), the repair operations (RO 14), the touch-up stations (TP 14), and the final finish operations (FF 14), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.8 and D.10 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.9.4 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor assembly operations SF 14) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.9.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 14), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to final finish operation (FF 14), when painting plastic, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.9.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.35 pounds per hour when operating at a process weight rate of 2,975.2 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.9.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.9.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Conditions D.9.2, D.9.4, and D.9.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.9.2, D.9.4, and D.9.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.9.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.9.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.9.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.9.10 Particulate Control

(a) In order to comply with Condition D.9.6, the baghouses DC1-14 through DC7-14 for particulate control shall be in operation and control emissions from the woodworking operation (WW 14) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.9.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.9.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 14), at least once per week when the woodworking process (WW 14) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.9.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.9.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.9.2 and D.9.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limit established in Condition D.9.2 and D.9.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Condition D.9.8(b) and D.9.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with condition D.9.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.9.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.9.4 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(c) To document the compliance status with condition D.9.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.9.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.9.5 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(d) To document the compliance status with Condition D.9.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.9.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.9.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.9.2 through D.9.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.10 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 19 - 2775 Hackberry Drive

(a) One (1) woodworking operation, identified as WW 19, constructed in 2006, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-2 through DC7-2.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 19, constructed in 2006, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, brush application and aerosol spray cans to coat metal, wood, fabric, and plastic, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 19, constructed in 2006, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.10.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 19) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.10.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 19), the subfloor installation operations (SF 19), the assembly operations (ALO 19), the repair operations (RO 19), the touch-up stations (TP 19), and the final finish operations (FF 19), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.9 and D.11 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.10.3 HAP Limitations [326 IAC 2-8] [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 19), the subfloor installation operations (SF 19), the assembly operations (ALO 19), the repair operations (RO 19), the touch-up stations (TP 19), and the final finish operations (FF 19), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.9 and D.11 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.10.4 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor assembly operations SF 19) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.10.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 19), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to final finish operation (FF 19), when painting plastic, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.10.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.27 pounds per hour when operating at a process weight rate of 2,908 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.10.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.10.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC content and usage limitations contained in Conditions D.10.2, D.10.4, and D.10.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.10.2, D.10.4, and D.10.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.10.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.10.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.10.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.10.10 Particulate Control

(a) In order to comply with Condition D.10.6, the baghouses DC1-19 through DC7-19 for particulate control shall be in operation and control emissions from the woodworking operation (WW 19) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.10.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.10.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 19), at least once per week when the woodworking process (WW 19) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.10.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.10.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.10.2 and D.10.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limit established in Condition D.10.2 and D.10.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.10.8 (b) and D.10.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with condition D.10.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.10.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.10.4 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(c) To document the compliance status with condition D.10.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.10.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.10.5 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(d) To document the compliance status with Condition D.10.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.10.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.10.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.10.2 through D.10.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.11 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 20 - 2769 Elders Drive

Five (5) lamination lines (identified as L1 through L5), constructed in 2007, used to manufacture exterior walls. Each lamination line has a maximum throughput capacity of 343.8 pounds of finished product per hour; and utilizes roll coating application.

(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 2-7-5(1)]

D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the combined VOC input, including coatings, dilution solvents and cleaning solvents, to the lamination lines (L1 through L3) to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.11.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the five lamination lines (L1 through L5), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.10 and D.13 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.11.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the five lamination lines (L1 through L5), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.10 and D.12 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.11.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Conditions D.11.1 and D.11.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.11.1 and D.11.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.11.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.11.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.11.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.11.7 Record Keeping Requirements

(a) To document the compliance status with condition D.11.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.11.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.11.1 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(b) To document the compliance status with Conditions D.11.2, and D.11.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.11.2 and D.11.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.11.5(b) and D.11.6(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

D.11.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.11.1, D.11.2, and D.11.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.12 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 29 - 2642 Hackberry Drive

One (1) woodworking operation, identified as WW 29, constructed in 2004, with a maximum throughput of 6,464 pounds per hour, controlled by dust collectors DC1-29 and DC2-29.

(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 2-7-5(1)]

D.12.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 8.94 pounds per hour when operating at a process weight rate of 6,400 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.12.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.12.3 Particulate Control

(a) In order to comply with Condition D.12.1, the baghouses DC1-29 and DC2-29 for particulate control shall be in operation and control emissions from the woodworking operation (WW 29) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.12.4 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.12.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 29), at least once per week when the woodworking process (WW 29) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.12.6 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.12.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.12.4, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.12.5, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.13 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 31 - 2642 Hackberry Drive

(a) One (1) woodworking operation, identified as WW 31, constructed in 1996, with a maximum throughput of 2,139.2 pounds per hour, controlled by dust collectors DC1-31 through DC7-31.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 31, constructed in 1996, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 31, constructed in 1996, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.13.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 31) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.13.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 31), the subfloor installation operations (SF 31), the assembly operations (ALO 31), the repair operations (RO 31), the touch-up stations (TP 31), and the final finish operations (FF 31), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.12 and D.14 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.13.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 31), the subfloor installation operations (SF 31), the assembly operations (ALO 31), the repair operations (RO 31), the touch-up stations (TP 31), and the final finish operations (FF 31), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11 and D.14 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.13.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 4.29 pounds per hour when operating at a process weight rate of 2,139.2 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.13.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.13.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.13.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.13.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.13.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.13.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.13.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.13.8 Particulate Control

(a) In order to comply with Condition D.13.4, the baghouses DC1-31 through DC7-31 for particulate control shall be in operation and control emissions from the woodworking operation (WW 31) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.13.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.13.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 31), at least once per week when the woodworking process (WW 31) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.13.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.13.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.13.2 and D.13.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.13.2 and D.13.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.13.6(b) and D.13.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOCs/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.13.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.13.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.13.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.13.2 and D.13.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.14 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 50 - 2420 Davis Drive

(a) One (1) woodworking operation, identified as WW 50, constructed in 2004, with a maximum throughput of 3,278.5 pounds per hour, controlled by dust collectors DC1-50 through DC7-50.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 50, constructed in 2004, with a maximum throughput of four (4) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 50, constructed in 2004, with a maximum throughput of four (4) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.14.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 50) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.14.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 50), the subfloor installation operations (SF 50), the assembly operations (ALO 50), the repair operations (RO 50), the touch-up stations (TP 50), and the final finish operations (FF 50), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.13, D.15, and D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.14.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 50), the subfloor installation operations (SF 50), the assembly operations (ALO 50), the repair operations (RO 50), the touch-up stations (TP 50), and the final finish operations (FF 50), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, D.13, D.15, and D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.14.4 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor assembly operations SF 50) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.14.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 50), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to final finish operation (FF 50), when painting plastic, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.14.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.71 pounds per hour when operating at a process weight rate of 3,278.5 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.14.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.14.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitation contained in Conditions D.14.2, D.14.4, and D.14.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.14.2, D.14.4, and D.14.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.14.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.14.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.14.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.14.10 Particulate Control

(a) In order to comply with Condition D.14.6, the baghouses DC1-50 through DC7-50 for particulate control shall be in operation and control emissions from the woodworking operation (WW 50) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.14.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.14.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 50), at least once per week when the woodworking process (WW 50) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.14.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.14.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.14.2 and D.14.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.14.2 and D.14.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.14.8(b) and D.14.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with condition D.14.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.14.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.14.4 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(c) To document the compliance status with condition D.14.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.14.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.14.5 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(d) To document the compliance status with Condition D.14.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.14.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.14.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.14.2 through D.14.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.15 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 17 - 2833 Sourwood Drive

(a) One (1) woodworking operation, identified as WW 17, constructed in 2003, with a maximum throughput of 2,114.6 pounds per hour, controlled by dust collectors DC1-17 through DC7-17.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 17, constructed in 2003, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 17, constructed in 2003, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.15.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 17) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.15.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 17), the subfloor installation operations (SF 17), the assembly operations (ALO 17), the repair operations (RO 17), the touch-up stations (TP 17), and the final finish operations (FF 17), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.14, and D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.15.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 17), the subfloor installation operations (SF 17), the assembly operations (ALO 17), the repair operations (RO 17), the touch-up stations (TP 17), and the final finish operations (FF 17), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, D.13, D.14, and D.1, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.15.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 4.26 pounds per hour when operating at a process weight rate of 2,114.6 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.15.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.15.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.15.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.15.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.15.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.15.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.15.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.15.8 Particulate Control

(a) In order to comply with Condition D.15.4, the baghouses DC1-17 through DC7-17 for particulate control shall be in operation and control emissions from the woodworking operation (WW 17) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.15.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.15.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 17), at least once per week when the woodworking process (WW 17) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.15.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.15.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.15.2 and D.15.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.15.2 and D.15.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.15.6(b) and D.15.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.15.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.15.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.15.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.15.2 and D.15.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.16 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 311 - 2400 East Kercher Drive

(a) One (1) woodworking operation, identified as WW 311, constructed in 2004, with a maximum throughput of 3,344.7 pounds per hour, controlled by dust collectors DC1-311 through DC7-311.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 311, constructed in 2004, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 311, constructed in 2004, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.16.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 311) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.16.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 311), the subfloor installation operations (SF 311), the assembly operations (ALO 311), the repair operations (RO 311), the touch-up stations (TP 311), and the final finish operations (FF 311), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.16.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 311), the subfloor installation operations (SF 311), the assembly operations (ALO 311), the repair operations (RO 311), the touch-up stations (TP 311), and the final finish operations (FF 311), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, and D.13 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.16.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO 311), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee, when coating plastic shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to final finish operation (FF 311), when painting plastic, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.16.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor installation operation SF 311) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.16.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.79 pounds per hour when operating at a process weight rate of 3,344.1 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.16.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.16.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Conditions D.16.2, D.16.4, and D.16.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Conditions D.16.2, D.16.4. and D.16.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.16.9 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.16.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.16.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.16.10 Particulate Control

(a) In order to comply with Condition D.16.6, the baghouses DC1-311 through DC7-311 for particulate control shall be in operation and control emissions from the woodworking operation (WW 311) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.16.11 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.16.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 311), at least once per week when the woodworking process (WW 311) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.16.13 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.16.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.16.2 and D.16.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.16.2 and D.16.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.16.8(b) and D.16.9(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with condition D.10.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.10.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

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

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

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

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

(3) The volume weighted VOC content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC usage for each month.

(6) The dates and times that the Permittee is complying with condition D.10.4 (326 IAC 8-1-6 (New Facilities; General Reduction Requirements) avoidance).

(c) To document the compliance status with condition D.10.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.10.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(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.

(3) The volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

(5) The total VOC usage for each day.

(6) The dates and times that the Permittee is complying with condition D.10.5 (326 IAC 8-2-9 (Miscellaneous Metal Coating)).

(d) To document the compliance status with Condition D.16.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document the compliance status with Condition D.16.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.16.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.16.2 through D.16.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.17 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 701 - 2639 Lincoln Way East

(a) One (1) woodworking operation, identified as WW 701, approved in 2009 for construction, with a maximum throughput of 2720 pounds per hour, controlled by dust collector DC1-701 through DC5-701.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 701, approved in 2009 for construction, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 701, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.17.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 701) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.17.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 701), the subfloor installation operations (SF 701), the assembly operations (ALO 701), the repair operations (RO 701), the touch-up stations (TP 701), and the final finish operations (FF 701), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.17.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 701), the subfloor installation operations (SF 701), the assembly operations (ALO 701), the repair operations (RO 701), the touch-up stations (TP 701), and the final finish operations (FF 701), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, and D.13 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.17.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.04 pounds per hour when operating at a process weight rate of 2,720 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.17.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.17.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.17.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.17.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.17.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.17.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.17.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.17.8 Particulate Control

(a) In order to comply with Condition D.17.4, the baghouses DC1-701 through DC7-701 for particulate control shall be in operation and control emissions from the woodworking operation (WW 701) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.17.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.17.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 701), at least once per week when the woodworking process (WW 701) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.17.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.17.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.17.2 through D.17.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.17.2 through D.17.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.17.6(b) and D.17.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.17.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.17.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.17.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.17.2 through D.17.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.18 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 702 - 2639 Lincoln Way East

(a) One (1) woodworking operation, identified as WW 702, approved in 2009 for construction, with a maximum throughput of 2720 pounds per hour, controlled by dust collectors DC1-702 through DC5-702.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application to coat wood and meta and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 702, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.18.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 702) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.18.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 702), the subfloor installation operations (SF 702), the assembly operations (ALO 702), the repair operations (RO 702), the touch-up stations (TP 702), and the final finish operations (FF 702), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.18.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 702), the subfloor installation operations (SF 702), the assembly operations (ALO 702), the repair operations (RO 702), the touch-up stations (TP 702), and the final finish operations (FF 702), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, and D.13 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.18.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.04 pounds per hour when operating at a process weight rate of 2,720 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.18.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.18.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.18.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.18.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.18.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.18.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.18.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.18.8 Particulate Control

(a) In order to comply with Condition D.18.4, the baghouses DC1-702 through DC7-702 for particulate control shall be in operation and control emissions from the woodworking operation (WW 702) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.18.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.18.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 702), at least once per week when the woodworking process (WW 702) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.18.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.18.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.18.2 through D.18.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.18.2 through D.18.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.18.6(b) and D.18.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.18.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.18.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.18.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.18.2 through D.18.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.19 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 703 - 2639 Lincoln Way East

(a) One (1) woodworking operation, identified as WW 703, approved in 2009 for construction, with a maximum throughput of 3,400 pounds per hour, controlled by dust collectors DC1-703 through DC5-703.

(b) One (1) surface coating operation, for chassis preparation, identified as CP 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF 703, approved in 2009 for construction, with a maximum throughput of two and one-half (2.5) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.19.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO 703) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.19.2 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 703), the subfloor installation operations (SF 703), the assembly operations (ALO 703), the repair operations (RO 703), the touch-up stations (TP 703), and the final finish operations (FF 703), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.19.3 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP 703), the subfloor installation operations (SF 703), the assembly operations (ALO 703), the repair operations (RO 703), the touch-up stations (TP 703), and the final finish operations (FF 703), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.11, and D.13 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.19.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 5.79 pounds per hour when operating at a process weight rate of 3,400 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.19.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.19.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC usage limitations contained in Condition D.19.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC usage limitations contained in Condition D.19.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

VOC emitted = SCL - SR

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.19.7 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.19.3 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” HAP data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly HAP input reported, the Permittee shall determine the HAP content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the HAP containing waste to be shipped offsite shall be analyzed within ninety (90) days of the issuance of this permit 039-28445-00620.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the HAP content of the HAP containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new HAP content shall be used in calculating the amount of HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of HAP in the waste.

(3) Minimum Assumed HAP content: The HAP content of the waste shipped offsite may be assumed to be equal to the HAP content of the material with the lowest HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" HAP data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the HAP containing waste stream and conduct an analysis for HAP content.

(d) Compliance with the HAP usage limitations contained in Condition D.19.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total hazardous air pollutant input for the previous month, minus the amount of HAP in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total HAP input, minus the amount of HAP in the waste shipped out for recycling or disposal, so as to arrive at the HAP input for the most recent twelve (12) consecutive month period.

(e) The HAP input for a month shall be calculated using the following equation:

HAP emitted = SCL - SR

Where:

SCL = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilutions solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, diluted solvents, and cleaning solvents, from the coating booths.

D.19.8 Particulate Control

(a) In order to comply with Condition D.19.4, the baghouses DC1-703 through DC5-703 for particulate control shall be in operation and control emissions from the woodworking operation (WW 703) at all times that the woodworking facilities are in operation.

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.19.9 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.19.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 703), at least once per week when the woodworking process (WW 703) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.19.11 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.19.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.19.2 through D.19.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.19.2 through D.19.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) If the amount of VOC/HAP in the waste material is being deducted from the VOC/HAP input as allowed in Conditions D.19.6(b) and D.19.7(b), then the following records shall be maintained:

(A) The amount of VOC/HAP containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC/HAP content of the waste and all records necessary to verify the amount and VOC/HAP content of the VOC/HAP containing waste shipped out for recycling or disposal.

(C) The weight of VOC/HAP input, minus the weight of VOC/HAP shipped out to be recycled or disposed of, for each compliance period.

(4) The cleanup solvent usage for each month;

(5) The total VOC/HAP usage for each month; and

(6) The weight of VOC/HAP emitted for each compliance period.

(b) To document the compliance status with Condition D.19.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.19.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.19.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.19.2 through D.19.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name:	Keystone RV Company
Source Address:	2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.:	T039-28445-00620
Facility:	All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter:	VOC Usage
Limit:	less than 246.1 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter: Single HAP Usage
Limit: less than 8.4 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name:	Keystone RV Company
Source Address:	2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.:	T039-28445-00620
Facility:	All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter:	Total HAPs Usage
Limit:	less than 23.8.4 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 4, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 41, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 14, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 19, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 20, L1 – L3 Lamination Lines
Parameter: Combined VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 50, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620
Facility: Plant 311, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-28445-00620

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Administrative Amendment

Source Description and Location

Source Name:	Keystone RV Company
Source Location:	2642 Hackberry Drive Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-28445-00620
Operation Permit Issuance Date:	February 4, 2010
Administrative Amendment No.:	039-29911-00620
Permit Reviewer:	Denny Vendt

Source Definition

This stationary recreational vehicle manufacturing company consists of sixteen (16) buildings with a total of twenty-two (22) plant designations:

(a) Plant 1 is located at 2525 Linden Drive, Goshen, Indiana;

(b) Plant 2 is located at 2478 Davis Drive, Goshen, Indiana;

(c) Plant 3 is located at 2855 Hackberry Drive, Goshen, Indiana;

(d) Plant 4 is located at 2860 Hackberry Drive, Goshen, Indiana;

(e) Plant 6 is located at 2642 Hackberry Drive, Goshen Indiana;

(f) Plant 7 is located at 2530 Linden Drive, Goshen, Indiana;

(g) Plant 8 is located at 2425 Davis Drive, Goshen, Indiana;

(h) Plant 14 is located at 2442 Davis Drive, Goshen, Indiana;

(i) Plant 17 is located at 2833 Sourwood Drive, Goshen, Indiana;

(j) Plant 18 is located at 2719 Hackberry Drive, Goshen, Indiana;

(k) Plant 19 is located at 2775 Hackberry Drive, Goshen, Indiana;

(l) Plant 20 is located at 2769 Elders Drive, Goshen, Indiana;

(m) Plant 23 is located at 2694 Hackberry Drive, Goshen, Indiana;

(n) Plant 27 is located at 2769 Elders Drive, Goshen, Indiana;

(o) Plant 29 is located at 2642 Hackberry Drive, Goshen, Indiana;

(p) Plant 31 is located at 2642 Hackberry Drive, Goshen, Indiana;

(q) Plant 41 is located at 3313 Corrie Drive, Goshen, Indiana;

(r) Plant 50 is located at 2420 Davis Drive, Goshen, Indiana;

(s) Plant 311 is located at 2400 East Kercher Drive, Goshen, Indiana;

(t) Plant 701 is located at 2639 Lincoln Way East, Goshen, Indiana;

(u) Plant 702 is located at 2639 Lincoln Way East, Goshen, Indiana; and

(v) Plant 703 is located at 2639 Lincoln Way East, Goshen, Indiana;

However, these plants are located on contiguous or adjacent properties, have the same SIC codes and are under common control, therefore they are considered one (1) source, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under Part 70 Operating Permit Renewal (T 039-28445-00620) on February 4, 2010.

Existing Approvals

The source was issued Part 70 Operating Permit No. 039-28445-00620 on February 4, 2010. The source has not received any approvals since this date.

County Attainment Status

The source is located in Elkhart County.

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

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

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

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for $PM_{2.5}$ 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 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.

Source Status

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

Pollutant	**Emissions** (ton/yr)
PM	82.78
PM_{10}	83.70
$PM_{2.5}$	83.70
SO_2	0.10
VOC	<246.1
CO	13.86
NO_X	16.51
Single HAP	<10
Total HAPs	<25

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) These emissions are based upon Part 70 Operating Permit No. 039-28445-00620, issued on February 4, 2010.

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Keystone Recreational Vehicle (RV) Company on November 22, 2010, relating to the relocation of plants 4, 12, 41, 701, 301 and reassignment of the corresponding emission units to reflect the new locations as well as the addition of space heating equipment to Plant 41. The following is a list of the proposed changes:

(a) The following is a list of the emission units to be relocated:

(1) The process and equipment, identified as Plant 12, has been moved from 2639 Lincoln Way East, Goshen, Indiana to 3313 Corrie Drive Goshen, Indiana. The plant designation has changed from Plant 12 to Plant 41 and all equipment associated with Plant 12 will be reassigned to Plant 41. New space heating equipment for the 3313 Corrie Drive location will be added and listed as insignificant activities under Plant 41. The existing space heating equipment associated with plant 12 will remain at its current location and be reassigned to Plant 701.

(2) The plant, identified as Plant 4, will be relocated from 2400 East Kercher Road, Goshen, Indiana to 2860 Hackberry Drive, Goshen, Indiana. The space heating equipment currently located at 2400 East Kercher Drive will remain and be reassigned to Plant 311.

(3) The plant, identified as Plant 311, will be relocated from 2860 Hackberry Drive, Goshen, Indiana to 2400 East Kercher Road, Goshen, Indiana. The space heating equipment currently located at 2860 Hackberry Drive will remain and be reassigned to Plant 4.

(b) The following is a list of new emission units:

Plant 41 – 3313 Corrie Drive

(1) Three (3) natural gas-fired space heaters, identified as TC1-41 through TC3-41, approved for construction in 2011, each with a maximum heat input of 0.58 million British thermal units per hour.

(2) One (1) natural gas-fired space heater, identified as SH1-41, approved for construction in 2011, with a maximum heat input of 0.25 million British thermal units per hour.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	0.02
PM_{10}	0.06
$PM_{2.5}$	0.06
SO_2	0.01
VOC	0.05
CO	0.72
NO_X	0.85
Single HAPs	0.015
Total HAPs	0.016

The increase in the potential to emit of all regulated pollutants due to this modification is less than the levels that would trigger a source modification pursuant to 326 IAC 2-7-10.5. The changes from this project will be incorporated into the permit as an Administrative Amendment under 326 IAC 2-7-11 because they revise descriptive information and incorporate an insignificant activity as defined in 326 IAC 2-7-1(21).

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 administrative amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (ton/yr)					
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Plant 1	4.22	4.27	0.01	All Surface Coating Operations are limited to <246.1 tons per year*	0.73	0.87
Plant 2	4.23	4.28	0.01		0.73	0.87
Plant 3	4.09	4.14	0.01		0.73	0.87
Plant 4	4.79	4.84	0.01		0.73	0.87
Plant 6	1.34	1.39	0.01		0.73	0.87
Plant 7	4.15	4.20	0.01		0.73	0.87
Plant 8	0.41	0.46	0.01		0.73	0.87
Plant 14	4.58	4.63	0.01		0.73	0.87
Plant 17	4.18	4.23	0.01		0.73	0.87
Plant 18	0.01	0.02	0.00		0.27	0.32
Plant 19	4.53	4.58	0.01		0.73	0.87
Plant 20	6.86	6.97	0.01		1.62	1.93
Plant 23	1.93	1.96	0.00		0.55	0.66
Plant 27	0.01	0.02	0.00		0.26	0.31
Plant 29	1.79	1.79	0.00		0.00	0.00
Plant 31	4.20	4.27	0.01		1.01	1.20
Plant 41	4.51	4.51	0.00		0.00	0.00
Plant 50	7.05	7.10	0.01		0.73	0.87
Plant 311	4.75	4.80	0.01		0.73	0.87

	Potential to Emit (ton/yr)					
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Plant 701	4.78	4.87	0.01		1.37	1.63
Plant 702	4.75	4.75	0		0	0
Plant 703	5.62	5.62	0		0	0
Plant 41 (new NGC units)	0.02	0.06	0.01	0.05	0.72	0.85
Total for Modification	0.02	0.06	0.01	0.05	0.72	0.85
Total for Source after the Modification	82.80	83.76	0.11	<250	14.58	17.36
PSD Major Source Thresholds	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this administrative amendment:

NSPS:

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

NESHAP:

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed new source.

CAM:

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as none of the new units have a potential to emit greater than Part 70 major source thresholds, no emission limitations apply to these units and none of the new units use control devices. Therefore, there is no change to CAM applicability as a result of this administrative amendment.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The new units are not regulated by this rule since the potential emissions from these units are less than the applicability threshold of 0.551 pounds per hour established in 326 IAC 6-3-1(b)(14).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no changes to the compliance determination and monitoring requirements as a result of this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T039-28445-00620. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold.**

The permit has been changed, and the table of Contents updated accordingly, in the following ways:

Change #1

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recreational vehicle (RV) manufacturing operation.

Source Address:	2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address:~~	~~P.O. Box 2000, Goshen, Indiana 46527-2000~~
General Source Phone Number:	(574)535-1974
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants

Change #2

Section B - Duty to Provide Information
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".

B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~ 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.

Change #3

Section B - Certification
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.

B.9 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

~~(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 the "responsible official" 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.~~

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states 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 Permittee may use** the attached Certification Form, **or its equivalent** with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

Change #4

Multiple Conditions - Responsible Official References
326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

* * *

The submittal by the Permittee does require ~~the~~ **a** certification that meets the requirements of 326 IAC 2-7-6(1) by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(34).

Change #5

Multiple Conditions - Certification Requirement References
IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

* * *

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application ~~shall be certified by the~~ **does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a** "responsible official" as defined by 326 IAC 2-7-1(34).

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

* * *

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
* * *

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

* * *

~~The application which shall be submitted by the Permittee~~ **Any such application** does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

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

* * *

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

* * *

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 **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

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

* * *

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(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 **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

* * *

The notification which shall be submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

* * *

The response action documents submitted pursuant to this condition do require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

* * *

The emission statement does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

Change #6

Section B - Preventive Maintenance Plan
IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs

(b) If required by specific condition(s) in Section D of this permit **where no PMP was previously required**, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) ~~within~~ **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 PMP extension notification does not require ~~the certification~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(~~b~~**c**) 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 **and their submittal** do not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**d**) 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.

Change #7

Section B - Emergency Provisions
IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

* * *

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

* * *

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * *

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by the "responsible official" need only be referenced by the date of the original report.~~

Change #8

Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements

IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report. The remaining Section B numbering has been renumbered to account for the removal of this condition.

~~B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported~~.~~ **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~ **not later than** thirty (30) days ~~of the~~ **after the** end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34)**. A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

(b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~ **The address for report submittal is:**

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

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

~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(~~e~~**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.

Change #9

Section B - Permit Revision Under Economic Incentives and Other Programs
IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

B.20 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

* * *

Change #10

Section C - Opacity
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.2 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:

* * *

Change #11

Section C - Incineration
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

C.4 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.~~ **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.**

Change #12

Section C - Performance Testing
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

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.~~

For performance testing required by this permit, ~~A~~ **a** test protocol, except as provided elsewhere in this permit, shall be submitted to:

Change #13

Section C - Compliance Monitoring
IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, ~~all monitoring and 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. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~ **for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:**

Change #14

Section C - Monitoring Methods
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used. The remaining Section C numbering has been renumbered to account for the removal of this condition.

~~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.~~

Change #15

Section C - Emergency Reduction Plans
IDEM, OAQ has decided not to list the submission date of the ERP because the ERP can be updated without a permit change.

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall ~~prepare~~ **maintain the most recently submitted** written emergency reduction plans (ERPs) consistent with safe operating procedures.

~~(b) These ERPs shall be submitted for approval 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~~

~~within 180 days from the date on which this source commences operation.~~

~~The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

(~~f~~b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Change #16

Section C - Response to Excursions or Exceedances
IDEM, OAQ 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.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(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:~~

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**~~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:~~ The Permittee shall record the reasonable response steps taken.

~~(1) monitoring data;~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions taken~~.

Change #17

Section C - Actions Related to Noncompliance Demonstrated by a Stack Test
IDEM, OAQ 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 revised 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.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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~~ **its** response actions to IDEM, OAQ, ~~within thirty (30) days of receipt of the test results~~ **no later than seventy-five (75) days after the date of the test.** ~~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~~ 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 twenty (120)~~ **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.

Change #18

Section C - Emission Statement
IDEM, OAQ decided to remove paragraph (c) of Section C - Emission Statement since it was duplicative of the requirement in Section C - General Reporting Requirements.

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

~~(a)~~ In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

* * *

~~(b) The emission statement 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.~~

Change #19

Section C - General Record Keeping Requirements
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

* * *

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required, **the Permittee** shall be ~~implemented within~~ allowed up to ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~ the date of initial start-up, whichever is later**, to begin such record keeping.**

Change #20

Section C - Compliance with 40 CFR 82 and 326 IAC 22-1
IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with **applicable** standards for recycling and emissions reduction:

~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~

~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~

~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

Change #21

For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.1.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.2.9 Visible Emissions Notations

* * *

(d) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.3.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.4.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.4.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.5.8 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.6.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.8.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.8.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.9.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.9.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.10.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.10.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.12.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.12.4 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.13.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.13.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.14.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.14.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.15.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.15.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.16.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.16.11 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.17.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.17.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.18.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.18.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.19.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.19.9 Visible Emissions Notations

* * *

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

Change #22

IDEM, OAQ has included the replacement of an instrument as an acceptable action in the Parametric Monitoring Condition(s).

D.1.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 1), at least once per week when the woodworking process (WW 1) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.2.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 2), at least once per week when the woodworking process (WW 2) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.3.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 3), at least once per week when the woodworking process (WW 3) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.4.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 4), at least once per week when the woodworking process (WW 4) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.5.9 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 6), at least once per week when the woodworking process (WW 6) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.6.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 7), at least once per week when the woodworking process (WW 7) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.8.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 41), at least once per week when the woodworking process (WW 41) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.9.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 14), at least once per week when the woodworking process (WW 14) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.10.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 19), at least once per week when the woodworking process (WW 19) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.12.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 29), at least once per week when the woodworking process (WW 29) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.13.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 31), at least once per week when the woodworking process (WW 31) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.14.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 50), at least once per week when the woodworking process (WW 50) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.15.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 17), at least once per week when the woodworking process (WW 17) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.16.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 311), at least once per week when the woodworking process (WW 311) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.17.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 701), at least once per week when the woodworking process (WW 701) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.18.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 702), at least once per week when the woodworking process (WW 702) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

D.19.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW 703), at least once per week when the woodworking process (WW 703) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months.

Change #23

The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

D.1.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.1.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that week).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.2.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.2.2 and D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.2.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.2.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.3.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.3.2 and D.3.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.3.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.3.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.4.14 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.4.2 and D.4.3 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.4.2 and D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with condition D.4.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.4.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.4.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.4.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.4.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.4.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.5.11 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.5.1 and D.5.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.5.8, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.5.9, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.6.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.6.2 and D.6.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.6.2 and D.6.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.6.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.6.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.7.8 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.7.1 and D.7.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.7.1 and D.7.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.8.14 Record Keeping Requirements

(a) To document **the** compliance **status** with condition D.8.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.8.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Conditions D.8.3 and D.8.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limits established in Conditions D.8.3 and D.8.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.8.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.8.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.8.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.8.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.9.14 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.9.2 and D.9.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limit established in Condition D.9.2 and D.9.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with condition D.9.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.9.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.9.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.9.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.9.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.9.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.10.14 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.10.2 and D.10.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and VOC/HAP content limit established in Condition D.10.2 and D.10.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with condition D.10.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.10.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.10.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.10.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.10.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.10.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.11.7 Record Keeping Requirements

(a) To document **the** compliance **status** with condition D.11.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.11.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Conditions D.11.2, and D.11.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Condition D.11.2 and D.11.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

D.12.7 Record Keeping Requirements

(a) To document **the** compliance **status** with Condition D.12.4, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document **the** compliance **status** with Condition D.12.5, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.13.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.13.2 and D.13.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.13.2 and D.13.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.13.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.13.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.14.14 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.14.2 and D.14.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.14.2 and D.14.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with condition D.14.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.14.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.14.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.14.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.14.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.14.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.15.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.15.2 and D.15.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.15.2 and D.15.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.15.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.15.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.16.14 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.16.2 and D.16.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.16.2 and D.16.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with condition D.10.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in condition D.10.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(c) To document **the** compliance **status** with condition D.10.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.10.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

* * *

(d) To document **the** compliance **status** with Condition D.16.11, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(e) To document **the** compliance **status** with Condition D.16.12, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(f) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.17.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.17.2 through D.17.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.17.2 through D.17.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.17.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.17.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.18.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.18.2 through D.18.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.18.2 through D.18.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.18.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.18.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.19.12 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.19.2 through D.19.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits established in Conditions D.19.2 through D.19.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

* * *

(b) To document **the** compliance **status** with Condition D.19.9, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document **the** compliance **status** with Condition D.19.10, the Permittee shall maintain weekly records of the pressure drop. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements~~,~~ of this permit **contains the Permittee's obligation with regard to the records required by this condition.**

D.1.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.1.2 and D.1.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.2.2 and D.2.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.3.2 and D.3.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.4.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.4.2, D.4.3, D.4.4 and D.4.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.5.12 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.5.1 and D.5.2 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.6.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.6.2 and D.6.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.7.9 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.7.1 and D.7.2 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.8.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.8.2 through D.8.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.9.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.9.2 through D.9.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.10.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.10.2 through D.10.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.11.8 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.11.1, D.11.2, and D.11.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.13.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.13.2 and D.13.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.14.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.14.2 through D.14.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.15.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.15.2 and D.15.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.16.15 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.16.2 through D.16.5 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.17.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.17.2 through D.17.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.18.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.18.2 through D.18.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

D.19.13 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.19.2 through D.19.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **not 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.** The report submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

Change #25

Summary of Updates to the permit forms

The following is a summary of the changes that have been made to the forms at the end of the permit:

(a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

(b) IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

(c) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

~~A certification is not required for this report.~~

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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter: VOC Usage
Limit: less than 246.1 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter: Single HAP Usage
Limit: less than 8.4 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: All Surface Coating Operations Listed in Sections D.1 through D.11 and D.13 through D.19
Parameter: Total HAPs Usage
Limit: less than 23.8.4 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 4, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 41, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 14, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 19, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 20, L1 – L3 Lamination Lines
Parameter: Combined VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 50, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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

Part 70 Quarterly Report

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620
Facility: Plant 311, Assembly Operations and Final Finish Operations
Parameter: VOC Usage
Limit: less than 25 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Keystone RV Company
Source Address: 2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address: 2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.: T039-28445-00620

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

~~Attach a signed certification to complete this report.~~

Modification No. 1:

Plant Relocation

The source is relocating the process equipment associated with Plant 12 to a new building, Plant 41, located at 3313 Corrie Drive, Goshen, Indiana. All equipment references formerly for Plant 12 will be changed to reflect the Plant 41 designation. The process equipment associated with Plant 4 will be relocated to 2860 Hackberry Drive. The process equipment associated with Plant 311 will be relocated to 2400 East Kercher Drive. The space heating units from both relocated plants will remain at the original address and the space heater's identification in Insignificant Activities will be changed to reflect the new plant designation. The year of construction for the space heaters of Plant 4 and Plant 311 have been switched in order to correspond with the correct year of installation. All new addresses and changes in equipment designation have been changed throughout the permit.

The permit has been revised as follows:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

The Source Definition from the previous Federally Enforceable State Operating Permit (F039-23645-00620, issued on January 16, 2009 was incorporated into this permit as follows:

This stationary RV manufacturing company consists of sixteen (16) buildings with a total of twenty-two (22) plant designations:

* * *

(d) Plant 4 is located at ~~2400 East Kercher Drive~~**2860 Hackberry Drive**, Goshen, Indiana;

* * *

(~~h~~**q**) Plant ~~12~~**41** is located at ~~2639 Lincoln Way East~~**3313 Corrie Drive**, Goshen, Indiana;

* * *

(s) Plant 311 is located at ~~2860 Hackberry Drive~~**2400 East Kercher Drive**, Goshen, Indiana;

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

* * *

Plant 4 **-** ~~2400 East Kercher Drive~~ **2860 Hackberry Drive** [Section D.4]

*** * ***

Plant ~~12~~**41** is located at ~~2639 Lincoln Way East~~**3313 Corrie Drive** [Section D.8]

(a) One (1) woodworking operation, identified as WW ~~12~~**41**, constructed in 1997, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-~~12~~**41** through DC7-~~12~~**41**.

(b) One (1) surface coating operation, for chassis preparation, identified as CP ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

* * *

Plant 311 - ~~2860 Hackberry Drive~~ **2400 East Kercher Drive** [Section D.16]

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

* * *

Plant 4 - ~~2400 East Kercher Drive~~ **2860 Hackberry Drive** [Section D.4]

(a) Three (3) natural gas-fired space heaters, identified as TC1-4 through TC3-4, constructed in 200~~2~~**4**, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-4, constructed in 200~~2~~**4**, with a maximum heat input of 0.25 million British thermal units per hour.

* * *

Plant 311 - ~~2860 Hackberry Drive~~ **2400 East Kercher Drive** [Section D.16]

(a) Three (3) natural gas-fired space heaters, identified as TC1-311 through TC3-311, constructed in 200~~4~~**2**, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-311, constructed in 200~~4~~**2**, with a maximum heat input of 0.25 million British thermal units per hour.

*** * ***

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:	Plant 4 - ~~2400 East Kercher Drive~~ **2860 Hackberry Drive**

*** * ***

SECTION D.8 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant ~~12~~**41 -** ~~2639 Lincoln Way East~~**3313 Corrie Drive**

(a) One (1) woodworking operation, identified as WW ~~12~~**41**, constructed in 1997, with a maximum throughput of 2,908 pounds per hour, controlled by dust collectors DC1-~~12~~**41** through DC7-~~12~~**41**.

(b) One (1) surface coating operation, for chassis preparation, identified as CP ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) prefabricated steel frames per hour, utilizing brush application and aerosol spray cans, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(c) One (1) surface coating operation, for subfloor installation, identified as SF ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application to coat wood and metal and emitting less than fifteen (15) pounds per day VOC for metal coating.

(d) One (1) assembly operation, identified as ALO ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, wood, fabric, and plastics, and using less than five (5) gallons of coating per day for airless spray application and emitting less than fifteen (15) pounds per day VOC for metal coating.

(e) One (1) repair operation, identified as RO ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat plastic and metal substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(f) One (1) touch-up painting station, identified as TP ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing HVLP application and aerosol spray cans to coat plastic substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(g) One (1) final finishing operation, identified as FF ~~12~~**41**, constructed in 1997, with a maximum throughput of three (3) RV units per hour, utilizing brush application and aerosol spray cans to coat metal, plastic, and wood substrates, and using less than five (5) gallons of coating per day and emitting less than fifteen (15) pounds per day VOC for metal coating.

(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 2-7-5(1)]

D.8.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the assembly operations (ALO ~~12~~**41**) and the final finish operation (FF ~~12~~**41**) shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.8.2 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products (subfloor assembly operations SF ~~12~~**41**) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.8.3 VOC Limitations [326 IAC 2-2]

The total VOC input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP ~~12~~**41**), the subfloor installation operations (SF ~~12~~**41**), the assembly operations (ALO ~~12~~**41**), the repair operations (RO ~~12~~**41**), the touch-up stations (TP ~~12~~**41**), and the final finish operations (FF ~~12~~**41**), and their associated clean-up activities, when combined with the VOC input to the surface coating operations in Sections D.1 through D.7 and D.9 through D.19, shall be less than two hundred forty-six and one-tenth (246.1) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.8.4 HAP Limitations [326 IAC 2-4.1]

The total HAP input, including coatings, dilution solvents and cleaning solvents, to the surface coating operations, including the chassis prep operations (CP ~~12~~**41**), the subfloor installation operations (SF ~~12~~**41**), the assembly operations (ALO ~~12~~**41**), the repair operations (RO ~~12~~**41**), the touch-up stations (TP ~~12~~**41**), and the final finish operations (FF ~~12~~**41**), and their associated clean-up activities, when combined with the HAP input to the surface coating operations in Sections D.1 through D.7 and D.9 through D.19, shall be less than eight and four-tenths (8.4) tons per twelve (12) consecutive month period of any single HAP, and less than twenty-three and four-tenths (23.4) tons per twelve (12) consecutive month period of total HAP, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source shall limit the HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for any single HAP and 25 tons per twelve (12) consecutive month period for any combination of HAPs and render the requirements of 326 IAC 2-4.1 (MACT) not applicable.

D.8.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents, to the assembly operation (ALO ~~12~~**41**), when coating plastics, to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input, including coatings, dilution solvents and cleaning solvents to final finish operation (FF ~~12~~**41**) to less than 25 tons per twelve (12) consecutive month period, when coating plastic, with compliance determined at the end of each month.

*** * ***

D.8.10 Particulate Control

(a) In order to comply with Condition D.8.6, the baghouses DC1-~~12~~**41** through DC7-~~12~~**41** for particulate control shall be in operation and control emissions from the woodworking operation (WW ~~12~~**41**) at all times that the woodworking facilities are in operation.

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

D.8.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking process (WW ~~12~~**41**), at least once per week when the woodworking process (WW ~~12~~**41**) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C – Response to Excursions and Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

*** * ***

SECTION D.16 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:	Plant 311 - ~~2860 Hackberry Drive~~ **2400 East Kercher Drive**

* * *

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

Part 70 Quarterly Report

Source Name:	Keystone RV Company
Source Address:	2642 Hackberry Drive, Goshen, Indiana 46526
~~Mailing Address:~~	~~2642 Hackberry Drive, Goshen, Indiana 46526~~
Part 70 Permit No.:	T039-28445-00620
Facility:	Plant ~~12~~**41**, Assembly Operations and Final Finish Operations
Parameter:	VOC Usage
Limit:	less than 25 tons per twelve (12) consecutive month period

* * *

Modification No. 2

The source is adding 4 new space heaters to the Insignificant Activities of Plant 41. The 7 space heaters previously associated with Plant 12 have been added to the Insignificant Activities of Plant 703.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

* * *

Plant ~~12~~**41 -** ~~2639 Lincoln Way East~~**3313 Corrie Drive** [Section D.8]

(a) ~~Six (6)~~**Three (3)** natural gas-fired space heaters, identified as TC1-~~12~~**41** through ~~TC6-12~~**TC3-41**, approved in 20~~09~~11 for construction, each with a maximum heat input of 0.58 million British thermal units per hour.

(b) One (1) natural gas-fired space heater, identified as SH1-~~12~~**41**, approved in 20~~09~~11 for construction, with a maximum heat input of 0.25 million British thermal units per hour.

(c) One (1) welding and cutting operation, identified as WC ~~12~~**41**, constructed in 1997, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(d) One (1) miscellaneous cutting or machining operation, identified as MPE ~~12~~**41**, constructed in 1997, with a maximum throughput of 348.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

* * *

Plant 701 - 2639 Lincoln Way East [Section D.17]

(a) One (1) welding and cutting operation, identified as WC 701, approved in 2009 for construction, including one (1) metal inert gas (MIG) welder, with a maximum throughput of 1.0 lb electrode per hour, and one (1) stick welder, with a maximum throughput of 0.50 lbs electrode per hour, and one (1) oxyacetylene cutting torch.

(b) One (1) miscellaneous cutting or machining operation, identified as MPE 701, approved in 2009 for construction, with a maximum throughput of 200.0 lbs of PVC pipe, aluminum tubing, and miscellaneous wood parts per hour.

(c) Six (6) natural gas-fired space heaters, identified as TC1-701 through TC6-701, approved in 2009 for construction, each with a maximum heat input of 0.58 million British thermal units per hour.

(d) One (1) natural gas-fired space heater, identified as SH1-701, approved in 2009 for construction, with a maximum heat input of 0.25 million British thermal units per hour.

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 039-29911-00620. The staff recommends to the Commissioner that this Part 70 Administrative Amendment be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Denny Vendt 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) 234-5300 or toll free at 1-800-451-6027 extension 4-5300

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

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

Appendix A: Emissions Calculations
Source Wide Summary of HAP Emissions for Insignificant Activities

Company Name: Keystone RV Company
Address City IN Zip: 2642 Hackberry Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

HAP POTENTIAL TO EMIT IN TONS PER YEAR

		Combined HAPs from Insignificant Activities			
Emission Units	**Combined HAP Emissions from Emission Units**	**Original Permit Welding Emissions**	**Original Permit Natural Gas Combustion Emissions**	**Recalculated Welding Emissions**	**Recalculated Natural Gas Combustion[1]**
Plant 1	5.01	0.0172	7.58E-04	0.0036	0.30
Plant 2	5.05	0.0172	7.58E-04	0.0036	
Plant 3	4.36	0.0172	7.58E-04	0.0036	
Plant 4	7.75	0.0172	7.58E-04	0.0036	
Plant 6	0.00	0.0000	7.58E-04	0.0000	
Plant 7	4.66	0.0172	7.58E-04	0.0036	
Plant 8	0.01	0.0036	7.58E-04	0.0023	
Plant 41	6.49	0.0172	1.42E-03	0.0036	
Plant 14	6.75	0.0172	7.58E-04	0.0036	
Plant 17	4.79	0.0172	7.58E-04	0.0036	
Plant 18	0.00	0.0000	2.78E-04	0.0000	
Plant 19	6.49	0.0172	7.58E-04	0.0036	
Plant 20	2.26	0.1000	1.68E-03	0.1111	
Plant 23	0.01	1.1700	5.72E-04	0.1181	
Plant 27	0.00	0.0000	2.67E-04	0.0000	
Plant 29	0.00	0.0000	0.00E+00	0.0000	
Plant 31	4.88	0.0172	1.04E-03	0.0036	
Plant 50	7.43	0.0351	7.58E-04	0.0073	
Plant 311	7.58	0.0172	7.58E-04	0.0036	
Plant 701	3.63	0.0162	0.00E+00	0.0036	
Plant 702	3.63	0.0162	0.00E+00	0.0036	
Plant 703	3.40	0.0351	0.00E+00	0.0073	
New Combustion Units for Plant 41	-	-	-	-	0.0161
Total Uncontrolled HAPs	**84.19**	**1.565**	**0.0144**	**0.2933**	**0.3203**
Total Combined HAPs for Insignificant Activities		1.58		0.61	

Source Wide Combined HAP Emissions	**Combined HAPs**
	Tons/year
Source Wide Uncontrolled HAP Emissions (Combined) without Insignificant Activities[2]	84.19
Title V (T039-28445-00620) Permitted HAP Minor Limit	23.4
Source Wide Natural Gas Combustion	0.32
Source Wide Welding Operations	0.29
Total Limited Source Wide HAP Emissions	24.01
Major Source threshold for Combined HAPs	25

[1] Emissions calculated using source wide combined heat input for all natural gas combustion units, value taken from Appendix A: Source Wide Natural Gas Combustion - Space Heaters
[2] Insignificant Activities for this source are comprised of natural gas combustion from space heaters and welding operations.

Appendix A: Emission Calculations
Natural Gas Combustion (Less than 100 MMBtu/hr)
Source Wide Natural Gas Combustion - Space Heaters

Company Name: **Keystone RV Company**
Address City IN Zip: **2642 Hackberry Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Reviewer: **Dennis Vendt**

			Pollutant					
			PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF			1.9	7.6	0.6	100.0	5.5	84.0
						**see below		
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)					
Combined Heat Input for all Natural Gas Combustion Units (Before Modification)	37.53	322.316	0.306	1.225	0.097	16.116	0.886	13.537
Total			0.31	1.22	0.10	16.12	0.89	13.54

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

			HAPs - Organics				
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)				
Combined Heat Input for all Natural Gas Combustion Units (Before Modification)	37.53	322.316	3.4E-04	1.9E-04	1.2E-02	2.9E-01	5.5E-04
Total			3.4E-04	1.9E-04	1.2E-02	2.9E-01	5.5E-04

			HAPs - Metals					
			Lead	Cadmium	Chromium	Manganese	Nickel	**Total HAPs (Organics+Metals)**
Emission Factor in lb/MMCF			5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)					
Combined Heat Input for all Natural Gas Combustion Units (Before Modification)	37.53	322.316	8.1E-05	1.8E-04	2.3E-04	6.1E-05	3.4E-04	3.0E-01
Total			8.1E-05	1.8E-04	2.3E-04	6.1E-05	3.4E-04	3.0E-01

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
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Heating Value of Natural Gas is assumed to be 1020 MMBTU/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (Supplement D 3/98)
Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

Plant Wide Heat Input from Natural Gas Combustion	
Plant#	(MMBtu/hr)
1CA	1.99
2CA	1.99
3CA	1.99
4CA	1.99
6CA	1.99
7CA	1.99
8CA	1.99
12 CA	3.73
14 CA	1.99
17 CA	1.99
18 CA	0.73
19 CA	1.99
20 CA	4.4
23 CA	1.5
27 CA	0.55
29 CA	0
31 CA	2.74
50 CA	1.99
311 CA	1.99
701 CA	0
702 CA	0
703 CA	0
Total	37.53

Appendix A: Emission Calculations
Natural Gas Combustion (Less than 100 MMBtu/hr)
Plant 41 Space Heaters

Company Name: **Keystone RV Company**
Address City IN Zip: **3313 Corrie Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Reviewer: **Denny Vendt**

			Pollutant					
			PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF			1.9	7.6	0.6	100.0	5.5	84.0
						**see below		
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)					
TC1-41	0.58	4.981	0.005	0.019	0.001	0.249	0.014	0.209
TC2-41	0.58	4.981	0.005	0.019	0.001	0.249	0.014	0.209
TC3-41	0.58	4.981	0.005	0.019	0.001	0.249	0.014	0.209
SH1-41	0.25	2.147	0.002	0.008	0.001	0.107	0.006	0.090
Total			0.02	0.06	0.01	0.85	0.05	0.72

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

			HAPs - Organics				
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)				
TC1-41	0.58	4.981	5.2E-06	3.0E-06	1.9E-04	4.5E-03	8.5E-06
TC2-41	0.58	4.981	5.2E-06	3.0E-06	1.9E-04	4.5E-03	8.5E-06
TC3-41	0.58	4.981	5.2E-06	3.0E-06	1.9E-04	4.5E-03	8.5E-06
SH1-41	0.25	2.147	2.3E-06	1.3E-06	8.1E-05	1.9E-03	3.7E-06
Total			1.8E-05	1.0E-05	6.4E-04	1.5E-02	2.9E-05

			HAPs - Metals					
			Lead	Cadmium	Chromium	Manganese	Nickel	**Total HAPs (Organics+Metals)**
Emission Factor in lb/MMCF			5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)					
TC1-41	0.58	4.981	1.2E-06	2.7E-06	3.5E-06	9.5E-07	5.2E-06	4.7E-03
TC2-41	0.58	4.981	1.2E-06	2.7E-06	3.5E-06	9.5E-07	5.2E-06	4.7E-03
TC3-41	0.58	4.981	1.2E-06	2.7E-06	3.5E-06	9.5E-07	5.2E-06	4.7E-03
SH1-41	0.25	2.147	5.4E-07	1.2E-06	1.5E-06	4.1E-07	2.3E-06	2.0E-03
Total			4.3E-06	9.4E-06	1.2E-05	3.2E-06	1.8E-05	1.6E-02

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
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Heating Value of Natural Gas is assumed to be 1020 MMBTU/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (Supplement D 3/98)
Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

Appendix A: Emissions Calculations

Summary of HAP Emissions from Weld-Cut Activities

Company Name: Keystone RV Company
Address City IN Zip: 2642 Hackberry Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

HAP Emissions (tons/year) from Plant Wide Weld-Cut Activities*

Plant #	Mn	Ni	Co	Cr	Total
1CA	0.0026	0.0002	0.0000	0.0007	0.0036
2CA	0.0026	0.0002	0.0000	0.0007	0.0036
3CA	0.0026	0.0002	0.0000	0.0007	0.0036
4CA	0.0026	0.0002	0.0000	0.0007	0.0036
6CA	0.0000	0.0000	0.0000	0.0000	0.0000
7CA	0.0026	0.0002	0.0000	0.0007	0.0036
8CA	0.0013	0.0002	0.0000	0.0007	0.0023
12 CA	0.0026	0.0002	0.0000	0.0007	0.0036
14 CA	0.0026	0.0002	0.0000	0.0007	0.0036
17 CA	0.0026	0.0002	0.0000	0.0007	0.0036
18 CA	0.0000	0.0000	0.0000	0.0000	0.0000
19 CA	0.0026	0.0002	0.0000	0.0007	0.0036
20 CA	0.1049	0.0021	0.0021	0.0021	0.1111
23 CA	0.1170	0.0004	0.0004	0.0004	0.1181
27 CA	0.0000	0.0000	0.0000	0.0000	0.0000
29 CA	0.0000	0.0000	0.0000	0.0000	0.0000
31 CA	0.0026	0.0002	0.0000	0.0007	0.0036
50 CA	0.0053	0.0005	0.0000	0.0015	0.0073
311 CA	0.0026	0.0002	0.0000	0.0007	0.0036
701 CA	0.0026	0.0002	0.0000	0.0007	0.0036
702 CA	0.0026	0.0002	0.0000	0.0007	0.0036
703 CA	0.0053	0.0005	0.0000	0.0015	0.0073
Total	**0.2682**	**0.0068**	**0.0025**	**0.0157**	**0.2933**

* Values from Title V operating Permit TSD (039-28445-00620) Appendix A: Emission Calculations, Welding and Thermal Cutting for each Plant using AP-42 Emission Factors from Table 12.19-2. Hazardous Air Pollutant (HAP) Emission Factors for Welding Operations

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 1)

Company Name: Keystone RV Company - Line 1
Address: 2525 Linden Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.005200	0.000318	0.000001	0.000001	0.000001	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.012050	0.000017	-	-	0.000005	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.0006	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 2)

Company Name: **Keystone RV Company - Plant 2**
Address: **2478 Davis Drive, Goshen, Indiana 46526**
Title V Operating Permit: **039-28445-00620**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.000318	0.000001	0.000001	0.000001	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.000017	-	-	0.000005	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 3)

Company Name: **Keystone RV Company - Plant 3**
Address: **2855 Hackberry Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 4)

Company Name: Keystone RV Company - Plant 4
Address: 2400 East Kercher Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 7)

Company Name: Keystone RV Company - Plant 7
Address: 2530 Linden Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 8)

Company Name: **Keystone RV Company - Plant 8**
Address: **2425 Davis Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	0.10	0.10	0.00520	0.000318	0.000001	0.000001	0.000001	0.00052	0.00003	0.00000	0.00000	0.00000	0.00003
Stick (E5154 electrode)	1	0.05	0.05	0.02410	0.000034	-	-	0.000010	0.00121	0.00000	-	-	0.00000	0.00000
		Total Electrodes	0.15											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.09	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.14	0.01	0.001	0.000	0.00	0.01
Potential Emissions tons/year									3.91E-01	1.33E-03	2.37E-04	4.38E-07	7.12E-04	2.28E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 41)

Company Name: **Keystone RV Company - Plant 41**
Address: **3313 Corrie Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 14)

Company Name: **Keystone RV Company - Plant 14**
Address: **2442 Davis Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 17)

Company Name: Keystone RV Company - Plant 17
Address: 2833 Sourwood Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 19)

Company Name: **Keystone RV Company - Plant 19**
Address: **2775 Hackberry Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 20)

Company Name: **Keystone RV Company - Plant 20**
Address: **2769 Elders Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG) (carbon steel)	28	1.71	47.88	0.00550	0.00050	0.00001	0.00001	0.00001	0.26334	0.02394	0.00048	0.00048	0.00048	0.02538
		Total Electrodes	47.88											
EMISSION TOTALS														
Potential Emissions lbs/hr									0.26	0.02	0.0005	0.00048	0.0005	0.03
Potential Emissions lbs/day									6.32	0.57	0.011	0.011	0.01	0.61
Potential Emissions tons/year									1.15E+00	1.05E-01	2.10E-03	2.10E-03	2.10E-03	1.11E-01

METHODOLOGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 23)

Company Name: **Keystone RV Company - Plant 23**
Address: **2694 Hackberry Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)	70	1.20	84.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.43680	0.02671	0.00008	0.00008	0.00008	0.02696
		Total Electrodes	84.00											
EMISSION TOTALS														
Potential Emissions lbs/hr									0.44	0.03	0.0001	0.00008	0.0001	0.03
Potential Emissions lbs/day									10.48	0.64	0.002	0.002	0.00	0.65
Potential Emissions tons/year									1.91E+00	1.17E-01	3.68E-04	3.68E-04	3.68E-04	1.18E-01

METHODOLOGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 31)

Company Name: **Keystone RV Company - Plant 31**
Address: **2642 Hackberry Drive, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 50)

Company Name: Keystone RV Company - Plant 50
Address: 2420 Davis Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	2	1.00	2.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.01040	0.00064	0.00000	0.00000	0.00000	0.00064
Stick (E5154 electrode)	2	0.50	1.00	0.02410	0.000034	-	-	0.000010	0.02410	0.00003	-	-	0.00001	0.00004
		Total Electrodes	3.00											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	2	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.17518	0.00054	0.00011	-	0.00032	0.00097
EMISSION TOTALS														
Potential Emissions lbs/hr									0.21	0.00	0.0001	0.00000	0.0003	0.00
Potential Emissions lbs/day									5.03	0.03	0.003	0.000	0.01	0.04
Potential Emissions tons/year									9.18E-01	5.30E-03	4.82E-04	8.76E-06	1.47E-03	7.26E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (WC 311)

Company Name: Keystone RV Company - Plant 311
Address: 2860 Hackberry Drive, Goshen, Indiana 46526
Administrative Amendment No.: 039-29911-00620
Plant Id: 039-00620
Prepared By: Denny Vendt

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 701)

Company Name: **Keystone RV Company - Line 701 - New Facility**
Address: **2639 Lincoln Way East, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 702)

Company Name: **Keystone RV Company - Line 702 - New Facility**
Address: **2639 Lincoln Way East, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	1	1.00	1.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.00520	0.00032	0.00000	0.00000	0.00000	0.00032
Stick (E5154 electrode)	1	0.50	0.50	0.02410	0.000034	-	-	0.000010	0.01205	0.00002	-	-	0.00001	0.00002
		Total Electrodes	1.50											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	1	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.08759	0.00027	0.00005	-	0.00016	0.00049
EMISSION TOTALS														
Potential Emissions lbs/hr									0.10	0.00	0.0001	0.00000	0.0002	0.00
Potential Emissions lbs/day									2.52	0.01	0.001	0.000	0.00	0.02
Potential Emissions tons/year									4.59E-01	2.65E-03	2.41E-04	4.38E-06	7.36E-04	3.63E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Appendix A: **Emissions Calculations**
Welding and Thermal Cutting (WC 703)

Company Name: **Keystone RV Company - Line 703 - New Facility**
Address: **2639 Lincoln Way East, Goshen, Indiana 46526**
Administrative Amendment No.: **039-29911-00620**
Plant Id: **039-00620**
Prepared By: **Denny Vendt**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(E70S)	2	1.00	2.00	0.00520	0.000318	0.000001	0.000001	0.000001	0.01040	0.00064	0.00000	0.00000	0.00000	0.00064
Stick (E5154 electrode)	2	0.50	1.00	0.02410	0.000034	-	-	0.000010	0.02410	0.00003	-	-	0.00001	0.00004
		Total Electrodes	3.00											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	2	0.75	12.00	0.1622	0.0005	0.0001	-	0.0003	0.17518	0.00054	0.00011	-	0.00032	0.00097
EMISSION TOTALS														
Potential Emissions lbs/hr									0.21	0.00	0.0001	0.00000	0.0003	0.00
Potential Emissions lbs/day									5.03	0.03	0.003	0.000	0.01	0.04
Potential Emissions tons/year									9.18E-01	5.30E-03	4.82E-04	8.76E-06	1.47E-03	7.26E-03

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

*Emission Factors from AP-42 Table 12.19-2 (HAP Emission Factors for Welding Operations) and are default values for carbon steel unless a specific electrode type is noted in the Process column.

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: Tim Edwards
Keystone RV Company
P.O. Box 2000
Goshen, IN 46527

DATE: March 15, 2011

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

SUBJECT: Final Decision
Administrative Amendment
039-29911-00620

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:
President (Keystone RV Company)
Dennis Carter (TecServ Environmental, 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	MIDENNEY 3/15/2011 Keystone Recreational Vehicle Company 039-29911-00620 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Tim Edwards Keystone Recreational Vehicle Company PO Box 2000 Goshen IN 46527-2000 (Source CAATS) via confirm delivery									
2		President Keystone Recreational Vehicle Company PO Box 2000 Goshen IN 46527-2000 *(RO CAATS)*									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
4		Goshen City Council and Mayors Office 202 South 5th Street Suite 1 Goshen IN 46528 *(Local Official)*									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
7		Dawn C & Carol A. Rademacher 656189 Harwood Drive Goshen IN 46526 *(Affected Party)*									
8		Mr. Leon Mullet 65600 Harwood Drive Goshen IN 46526 *(Affected Party)*									
9		Mr. Mary Schmucker 65584 Harwood Drive Goshen IN 46526 *(Affected Party)*									
10		Mr. Jason Mast 65568 Harwood Drive Goshen IN 46526 *(Affected Party)*									
11		Brent D & Jennifer L. Miller 65552 Harwood Drive Goshen IN 46526 *(Affected Party)*									
12		Raymond L & Dorthea M Troyer 604 Skyview Drive Goshen IN 46526 *(Affected Party)*									
13		June M. Pendleton 17525 Brentwood Drive Goshen IN 46526 (Affected Party)									
14		Guadalupe G. Sandoval 17559 Brentwood Drive Goshen IN 46526 *(Affected Party)*									
15		Benjamin L & Ryann M. Stanley 17575 Brentwood Drive Goshen IN 46526 *(Affected Party)*									

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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Mail Code 61-53

IDEM Staff	MIDENNEY 3/15/2011 Keystone Recreational Vehicle Company 039-29911-00620 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		James Lotero 17591 Brentwood Drive Goshen IN 46526 (Affected Party)									
2		Ms. Laura Guevara 17609 Brentwood Drive Goshen IN 46526 *(Affected Party)*									
3		Mr. Timmy R, Fritz 17625 Brentwood Drive Goshen IN 46526 *(Affected Party)*									
4		Mr. Hector M. Gallegos 17643 Brentwood Drive Goshen IN 46526 *(Affected Party)*									
5		Mr. Ivan Anderson 64414 CR 27 Goshen IN 46526 *(Affected Party)*									
6		Mr. Gregory A. Hoogenboom 1738 W Lincoln Avenue Goshen IN 46526 *(Affected Party)*									
7		Glen W, & Cardan M. Chupp 65385 CR 27 Goshen IN 46526 *(Affected Party)*									
8		Daniel J Sr. & Beverly A. Arseneau 1900 Wiley Rige Road Kankokee IL 60901 *(Affected Party)*									
9		Myrl D. & Terry F. Nofzinger & Hoogenboom 1738 W Lincoln Ave Goshen IN 46526 *(Affected Party)*									
10		Daniel S. & Elizabeth A. Haifley 65241 CR 27 Goshen IN 46526 *(Affected Party)*									
11		John R. & Erma J. Glover 65261 CR 27 Goshen IN 46526 *(Affected Party)*									
12		Mr. Todd Neuschwander 18447 CR 40 Goshen IN 46526 *(Affected Party)*									
13		Cross Court Sports Ministries, Inc. PO Box 336 Goshen IN 46527 (Affected Party)									
14		G & C Real Estate Properties 1801 Keystone Drive Goshen IN 46526 *(Affected Party)*									
15		JJW Development Inc. 66480 High Meadow Court Edwardsburg MI 49112 *(Affected Party)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Larry L. & Louis P.McKibbin 2448 E Kercher Road Goshen IN 46526 (Affected Party)									
2		Phillip A. & Janet M. Miller 1507 S 14th Street Goshen IN 46526 *(Affected Party)*									
3		Daniel D. & Yvonne E. Schwartz 20292 CR 36 Goshen IN 46526 *(Affected Party)*									
4		Chapman Reality Co. PO Box 461 Goshen IN 46527 *(Affected Party)*									
5		Herr Custom Paint Inc. 2456 E Kercher Road Goshen IN 46526 *(Affected Party)*									
6		McNeil Rescue Corp. 2429 Lincolnway E. Goshen IN 46526 *(Affected Party)*									
7		Lippert Components 2703 College Ave Goshen IN 46528 *(Affected Party)*									
8		North Central Cooperative Inc. PO Box 299 Wabash IN 46992 *(Affected Party)*									
9		Mr. Dennis Beadle Old World Wood Products 708 E Medusa Street Syracuse IN 46567 *(Affected Party)*									
10		Schmitt Reality Inc. 114 Westwood Road Goshen IN 46526 *(Affected Party)*									
11		Owens Corning One Owens Corning Parkway Toledo OH 43659 *(Affected Party)*									
12		Mr. Lonnie G. Bontrager 69778 CR 137 Millersburg IN 46543 *(Affected Party)*									
13		Dennis Carter TecServ Environmental, Inc. 516 E. Marion St. Mishawaka IN 46545 (Consultant)									
14		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
15											

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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