



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: April 27, 2011

RE: Winnebago of Indiana LLC / 039-30424-00444

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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Sheldon Troyer
Winnebago of Indiana, LLC
201 14th St
Middlebury, IN 46540

April 27, 2011

Re: 039-30424-00444
Second Administrative Amendment to
F039-24096-00444

Dear Sheldon Troyer:

Winnebago of Indiana, LLC., was issued a Federally Enforceable State Operating Permit (FESOP) No. F039-24096-00444 on March 19, 2007 for a stationary towable recreational vehicle manufacturing source located at 201 14th Street, Middlebury, IN 46540. On April 08, 2011, the Office of Air Quality (OAQ) received an application to add a rollcoat lamination process to the existing operation. The addition of rollcoat lamination unit to the permit is considered an administrative amendment, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-8-11.1(d)(4) and 326 IAC 2-8-11.1(f)(1)(G), respectively. The entire source will continue to limit VOC emissions to 97.80 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. The addition of lamination process will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. See Appendix A for the PTE of the new emission unit and the entire source.

Rule applicability flat wood panel lamination process:

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), 326 IAC 20-80-1, are not applicable because this source does not coat metal parts and is not a major source of HAPs as defined in 40 CFR 63.3.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart H (326 IAC 20-80), are not applicable because this source does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), does not perform autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (c) 40 CFR 63, Subpart T (Halogenated Solvent Cleaning)
The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart T are not included in this permit since it has neither vapor nor cold cleaning machines (of either batch or in-line design) according to the definitions pursuant to 40 CFR 63.461. This source does not heat any solvent (which would meet the definition of "cold" cleaning), nor does it boil any solvent (which would meet the definition of "vapor" cleaning). Moreover, the source uses none of the solvents listed at 40 CFR 63.460(a), nor any combination of these in a total concentration greater than five (5) percent by weight, as a cleaning agent.

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

Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds per day before add-on controls. This rule does not apply to flat wood panel lamination process and cleaning operation because the emissions are less than 15 lbs/day, and it does not coat metal parts.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The flat wood lamination process and cleaning operation is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from process is less than twenty-five (25) tons per year.

326 IAC 6-3-1 (Particulate)

The flat wood lamination process and cleaning operation using rollercoating is not subject to the requirements of 326 IAC 6-3-1 therefore is exempt from this rule.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

The emission unit description in Section A.4 has been updated, related D.1 conditions and FESOP Quarterly Reports, are revised to include the emission unit description and the modifications.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- ...
- (9) **One (1) flat wood panel lamination process, using rollercoating application, approved for construction in 2011, maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.**

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

.....
Insignificant Activities [326 IAC-2-7-1(21)]

- (9) **One (1) flat wood panel lamination process, using rollercoating application, approved for construction in 2011, maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.**

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

...
D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the following conditions shall apply:

- (a) The total volatile organic compounds (VOC) delivered to the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), and SB-071 (Sealant & Adhesive Application), **and flat wood panel lamination process**, shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance

determined at the end of each month. In addition these operations should be in compliance with Condition D.1.1.

- (b) The amount of each single and total HAPs delivered the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), ~~and~~ SB-071 (Sealant & Adhesive Application), **and flat wood panel lamination process**, shall be limited such that the emissions from these operations of each single HAP and total HAPs shall not exceed 9.0 and 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

...

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

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), ~~and~~ SB-071 (Sealant & Adhesive Application) **and flat wood panel lamination.**
Parameter: VOC input usage

...

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), ~~and~~ SB-071 (Sealant & Adhesive Application), **and flat wood panel lamination.**
Parameter: Single HAP and Total HAPs input usage

...

IDEM has made additional revisions to the permit as follows:

1. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

Mailing Address: _____ 201 14th Street, Middlebury, IN 46540

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

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 Ms. Swarna Prabha of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376.

Sincerely,



Iryn Galilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Appendix A

IC/SP

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



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) AND NEW SOURCE REVIEW (NSR) OFFICE OF AIR QUALITY

**Winnebago of Indiana, LLC
201 14th Street
Middlebury, Indiana 46540**

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

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. 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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 2-8 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.: F039-24096-00444	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 19, 2007 Expiration Date: March 19, 2012

First Administrative Amendment No.039-30111-00444, issued on January, 27, 2011

Second Administrative Amendment No.039-30424-00444	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 27, 2011 Expiration Date: March 19, 2012

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 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 2-8-3(b)]

Source Address:	201 14 th Street, Middlebury, IN 46540
General Source Phone:	(574) 825-5220
SIC Code:	3792
County:	Elkhart
Source Location Status:	Unclassifiable or Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Minor Source under Emission Offset and Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter).
 - (1) One (1) insulation panel gluing operation, consisting of four (4) glue stations identified as SB-064 through SB-067, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless application system and exhausting inside the building.
 - (2) Two (2) manual application processes of sealants and adhesives identified as SB-069 and SB-071, for plant wide fabrication processes and exhausting inside the building.
 - (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of one (1) mobile stain touch up process identified as SB-068, rated at

- 0.024 gallons per hour, with utilizing air atomized spray application method and exhausting inside the building.
- (4) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method and exhausting inside the building.
 - (5) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42). [326 IAC 6-3-2]
 - (6) Two (2) woodworking operations each with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day each unit, consisting of:
 - (i) One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
 - (ii) One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, both controlled by a 5100 cubic feet per minute pulse-jet, return-air baghouse; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1104 pounds per hour.
 - (7) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
 - (8) Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).
 - (9) One (1) flat wood panel lamination process, using rollercoating application, approved for construction in 2011, maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
 - (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

- (1) One (1) natural gas fired heater, identified as SB-023, with a maximum heat input rate of 0.4 MMBtu/hr.
 - (2) One (1) natural gas fired heater, identified as SB-016, with a maximum heat input rate of 0.08 MMBtu/hr.
 - (3) Six (6) natural gas fired heaters, identified as SB-017 through SB-022, each with a maximum heat input rate of 0.16 MMBtu/hr.
 - (4) Five (5) natural gas fired heaters, identified as SV 25 through SV 29 and each with a maximum heat input rate of 0.4 MMBtu/hr.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, F039-24096-00444, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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
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Indianapolis, Indiana 46204-2251

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

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

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, 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 Section), or
Telephone Number: 317-233-0178(ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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 2-8-4(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 certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-24096-00444 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 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 2-8 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 Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

Emissions Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.7 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.

C.8 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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

-
- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval." All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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. 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:

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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (1) "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions are, or opacity is, greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement), consistent with any averaging period specified for averaging the results of the monitoring.
- (2) "Excursion" shall mean a departure from an indicator range established for monitoring under Section D of this permit, consistent with any averaging period specified for averaging the results of the monitoring.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements[326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(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, and the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit 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.

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 the 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One fiberglass insulation panel gluing operation consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method, and exhausting inside the building.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide identified as (FUG50, FUG52 and FUG53), exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation, and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, identified as FUG51 and SB-070, and exhausting inside the building.
- (d) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter):
 - (1) One (1) insulation panel gluing operation, consisting of four (4) glue stations identified as SB-064 through SB-067, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless application system and exhausting inside the building.
 - (2) Two (2) manual application processes of sealants and adhesives identified as SB-069 and SB-071, for plant wide fabrication processes and exhausting inside the building.

Insignificant Activities [326 IAC-2-7-1(21)]

- (9) One (1) flat wood panel lamination process, using rollercoating application, approved for construction in 2011, maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to Part 70 operating permit 039-7803-00444, issued on October 12, 1998, Significant Permit Modification, 039-19129-00444, issued on September 17, 2004, and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

- (a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40 and FUG44);
- (b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray.
- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup.

Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;

- (d) Limit total VOC input to each facility as follows:
- (1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.
 - (2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.
- (e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the following conditions shall apply:

- (a) The total volatile organic compounds (VOC) delivered to the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application), and flat wood panel lamination process, shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. In addition these operations should be in compliance with Condition D.1.1.
- (b) The amount of each single and total HAPs delivered the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application), and flat wood panel lamination process, shall be limited such that the emissions from these operations of each single HAP and total HAPs shall not exceed 9.0 and 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with above conditions will limit the source-wide VOC, single HAP, and total HAPs emissions including insignificant activities to less than 100, 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 40 CFR Part 63 (Subpart PPPP) does not apply.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the manual application process SB-069 which coats metal parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm or air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and 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.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs emission limits established in Conditions D.1.1, and 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 and HAPs 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) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 3 pound per hour VOC and less than 5 pounds per hour Particulate Matter):
- (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of one (1) mobile stain touch up process identified as SB-068, rated at 0.024 gallons per hour, with utilizing air atomized spray application method and exhausting inside the building.
 - (4) One (1) pre-finished wood cabinet assembly and stain touch up operation, consisting of five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method and exhausting inside the building.
 - (5) Welding operations with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42). [326 IAC 6-3-2].
 - (6) Two (2) woodworking operations each with Particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day each unit, consisting of: [326 IAC 6-3-2].
 - (i) One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
 - (ii) One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, both controlled by a 5100 cubic feet per minute pulse-jet, return-air baghouse; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1104 pounds per hour.
 - (7) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
 - (8) Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2].

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 3.45 pounds per hour when operating at a process weight rate of 1549 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

Compliance Determination Requirements

D.2.2 Particulate Matter (PM) [326 IAC 2-8-5(a)(4)]

The baghouse for PM control shall be in operation at all times when the woodworking facilities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444

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) 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 Describe:
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

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Glue Operation (FUG26, FUG39, FUG40 and FUG44), and Glue Operation (SB-064 through SB-067).
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 28.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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**

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Sealant & Adhesive Usage (FUG50, FUG52, FUG53), and SB-069 (Sealant & Adhesive Application), and SB-071 (Sealant & Adhesive Application).
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 29.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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**

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application) and flat wood panel lamination.
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444
Facility: Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application), and flat wood panel lamination.
Parameter: Single HAP and Total HAPs input usage
Limit: The amount of single and total HAPs input to the above units shall be limited such that the emissions from these operation for each single HAP and total HAPs emissions shall not exceed 9.0 and 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Total HAPs	Single HAP	Total HAPs	Single HAP	Total HAPs
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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-24096-00444

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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 ANo deviations occurred this reporting period@.	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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.

Appendix A: Emission Calculations

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, IN 46540
Permit No.: F039-24096-00444
Administrative Amendment No.: F039-30424-00444
Reviewer: Swarna Prabha

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Surface Coating	Wood Lamination process [*]	Wood Working	Clean-up Operations	Natural Gas Combustion	Welding	TOTAL
PM	0.14	0.11	18.76	0.00	0.05	0.01	19.07
PM10	0.14	0.11	18.76	0.00	0.20	0.01	19.22
SO2	0.00	0.00	0.00	0.00	0.02	0.00	0.02
NOx	0.00	0.00	0.00	0.00	2.60	0.00	2.60
VOC	127.30	negl.	0.00	6.96	0.14	0.00	134.40
CO	0.00	0.00	0.00	0.00	2.19	0.00	2.19
total HAPs	53.26	negl.	0.00	2.50	0.05	0.00	55.81
worst case single HAP	(Hexane) 15.86	negl.	0.00	(Toluene) 2.46	Hexane (0.046)	0.00	(Hexane) 15.91
Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Surface Coating	Wood Lamination process [*]	Wood Working	Clean-up Operations	Natural Gas Combustion	Welding	TOTAL
PM	0.14	0.11	1.16	0.00	0.05	0.01	1.47
PM10	0.14	0.11	1.16	0.00	0.20	0.01	1.62
SO2	0.00	0.00	0.00	0.00	0.02	0.00	0.02
NOx	0.00	0.00	0.00	0.00	2.60	0.00	2.60
VOC	A	negl.	0.00	A	0.14	0.00	99.00
CO	0.00	0.00	0.00	0.00	2.19	0.00	2.19
total HAPs	B	negl.	0.00	B	0.05	0.00	< 10.0
worst case single HAP	B	negl.	0.00	B	Hexane (0.046)	0.00	< 25.0

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

There is no emission factor in AP-42 for PM2.5, PM10 = PM2.5

Note:

^{*} Particulate emissions from wood lamination process are based on the air flow rate and the grain loading of the filter.

[^] The total volatile organic compounds (VOC) delivered to the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application) and flat wood panel lamination shall be limited such that the VOC emissions from these operations shall not exceed 97.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

^B The amount of single and total HAPs delivered the Glue Operation (FUG26, FUG39, FUG40 and FUG44), Sealant & Adhesive Usage (FUG50, FUG52, FUG53), Cleaning Solvent Usage (FUG51 and SB-070), Glue Operation (SB-064 through SB-067), Misc. Clean Up Operations and Material Containing VOCs, SB-069 (Sealant & Adhesive Application), SB-071 (Sealant & Adhesive Application) and flat wood panel lamination shall be limited such that the source wide single HAP and total HAPs emissions shall not exceed 9.0 and 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Appendix A: Emissions Calculations

VOC and Particulate

Parts Lamination (SPL 3)

Company Name: Winnebago of Indiana, LLC
 Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
 FESOP: 039-24096-00444
 Administrative Amendment No.: F039-30424-00444
 Prepared By: D&B Environmental Services, Inc.
 Reviewed By: Swarna Prabha

Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	**PTE VOC (ton/yr)	*PTE PM/PM10 (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Notes Below)	Substrate
Lamination Pur-Fect Lok-Adhesive	8.93	0.000000004%	0.00%	0.00%	0.00%	95.00%	1.4780	25.000	0.00	0.00	1.37E-08	3.28E-07	5.99E-08	0.11	0.00	100%	Plastic/Wood
*Lamination 2352 equipment cleaner	8.14	0.00%	0.00%	0.00%	0.00%	100.00%	0.0002	25.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Plastic/Wood

Potential to Emit	1.37E-08	3.28E-07	5.99E-08	0.11
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*2352 Cleaner is a heat dissolved solid

HAZARDOUS AIR POLLUTANTS

Process	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexamethylene-1,6-diisocyanate	Weight % MDI	Weight % MIBK	Weight % Styrene	Weight % Toluene	Weight % Xylene	Hexamethylene-1,6-diisocyanate (ton/yr)	MDI Emissions (ton/yr)	MIBK Emissions (ton/yr)	Styrene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Lamination Pur-Fect Lok-Adhesive	8.93	1.48E+00	25.000	0.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
*Lamination 2352 equipment cleaner	8.14	2.49E-04	25.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Uncontrolled Potential Emissions	0.00	5.99E-08	0.00	0.00	0.00	0.00	5.99E-08
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There is no emission factor for PM2.5 in AP-42, PM10 = PM2.5

METHODOLOGY

Formula - MDI $W = 25.4 * V_{pmdi} * (MW / T_{proc}) * u^{0.78} * SA * tTF * K_{mdi}$

Where:

W = Evaporative Losses (grams/day)
 V_{pmdi} = Vapor Pressure at Temperature Used (Atmospheres) at process temperature
 MW = Molecular Weight (MDI = 250.26)
 T_{proc} = Process Temperature (Kelvin)
 u = Air Flow Rate (m/s), tTF = Tack Free Time in Seconds (Default = 5 Seconds)
 SA = Exposed Surface Area (Square Meters Exposed/Day)
 Pur-Fect Lok 834A 1.023E-05 mm HG 1.346E-08 Atm
 MW = Molecular Weight (MDI = 250.26) 250.26
 T_{proc} = Process Temperature (Kelvin) 77 F 298.15 K
 u = Air Flow Rate (m/s) 100 ft/min 0.508 m/s
 SA = Exposed Surface Area (Square Meters Exposed/Day)

Formula - PM (from Stack Test data)

PTE PM, PM10, PM2.5
 Grain loading = 0.0056 gr/scf
 Flowrate = 500 acfm
 PTE PM = Flowrate x Grain Loading x 8760 hrs/yr x 60 min/hr / 7000 gr/lb = lbs/yr
 PTE PM = 211.74 lbs/yr
 PTE PM = 0.11 tons/yr

Adhesive	Use	Units Annual (Average Size)	Maximum Area Coated Annual (ft2)	Maximum Area Coated per Day (ft2)	Maximum Exposed Area M2/Day	Units	Emissions grams/day per Formula
Pur-Fect Lok 834A	Side Wall Coverage	5950 sf/hr 230 sf/unit	4,462,500	12,226.03	1,135.83	M2	1.49E-04

tTF = Tack Free Time in Seconds (Default = 5 Seconds) 5 s

K_{mdi} = Vapor Pressure Adjustment Factor for Polyisocyanate Concentration (80 degrees @ 5% MDI from Table B) 0.16

**PTE Rate 1.49E-04 grams/day
 PTE Rate 6.21E-06 grams/hour = grams/day / 24 hours/day
 PTE Rate 1.37E-08 lbs/hour = grams/hour / 453.5 grams/lb
 PTE Rate 3.28E-07 lbs/day = lbs/hour x 24 hours /day
 PTE Rate 5.99E-08 tons/year = lbs/day x 365 days/year x 1/2,000 lb/ton

NOTE:
 Alliance for the Polyurethanes Industry: Estimating MDI Emissions for Section 313 of EPCRA Reporting



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: Sheldon Troyer
Winnebago of Indiana LLC
201 14th St.
Middlebury IN 46540

DATE: April 27, 2011

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

SUBJECT: Final Decision
Administrative Amendment
039-30424-00444

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:
Elvie J. Frey Sr. President Winnebago of Indiana LLC
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	BMILLER 4/27/2011 Winnebago of Indiana LLC 039-30424-00444 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Sheldon Troyer Winnebago of Indiana LLC 201 14th St Middlebury IN 46540 (Source CAATS) <i>Via Confirm Delivery</i>									
2		Elvie J. Frey Sr. President Winnebago of Indiana LLC 201 14th St Middlebury IN 46540 (RO CAATS)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
5		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
8											
9											
10											
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