



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 26, 2012

RE: Winnebago of Indiana, LLC/039-30646-00444

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**Federally Enforceable State Operating Permit
Renewal
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.

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.

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.

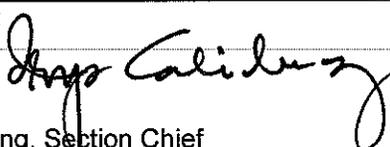
Operation Permit No.: F039-30646-00444	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 26, 2012 Expiration Date: March 26, 2022

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Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

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)]

The Permittee owns and operates a stationary towable recreational vehicle manufacturing operation.

Source Address:	201 14th Street, Middlebury, Indiana 46540
General Source Phone Number:	574-825-5220
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Building 3

- (a) Building 3 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside of the building.

This is an affected source under 40 CFR Part 63, Subpart HHHHHH.

- (b) Building 3 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting inside the building.

Building 4

- (d) Building 4 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside the building.

This is an affected source under 40 CFR Part 63, Subpart HHHHHH.

- (e) Building 4 Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (f) Building 4 hand application of mineral spirits for cleaning purposes plantwide, exhausting inside the building.

NOTE: The source-wide capacity of the Building 3 and Building 4 production lines is 2.4 units per hour combined.

A.3 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):

- (1) Two (2) stick welders with particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day per unit.
- (2) Two (2) woodworking operations, identified as P3DC and P4DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per 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 1,104 pounds per hour.
- (3) 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).
- (4) One (1) flat wood panel lamination process, using roller coating application, constructed in 2011, with a maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.
- (5) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (a) One (1) natural gas fired heater, identified as SB-023, with a maximum heat input rate of 0.4 MMBtu/hr.
 - (b) One (1) natural gas fired heater, identified as SB-016, with a maximum heat input rate of 0.08 MMBtu/hr.
 - (c) 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.
 - (d) 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.

A.4 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) to renew 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, F039-30646-00444, is issued for a fixed term of ten (10) 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] [IC 13-17-12]

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (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 describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.

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

- (a) All terms and conditions of permits established prior to F039-30646-00444 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 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 Federally Enforceable State Operating

Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.16 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

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

(2) Any 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.22 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 no later than 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.23 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

Emission 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) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

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

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.11 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.12 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.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.15 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. Support information includes the following:
 - (AA) All calibration and maintenance records.

- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Building 3

- (a) Building 3 fabrication consisting of four (4) glue stations, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside of the building.

Under 40 CFR, Subpart HHHHHH, the glue stations are an affected source.

- (b) Building 3 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (c) Building 3 hand application of mineral spirits for cleaning purposes plant-wide, exhausting inside the building.

Building 4

- (d) Building 4 fabrication consisting of four (4) glue stations, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside of the building.

Under 40 CFR 63, Subpart HHHHHH, the glue stations are an affected source.

- (e) Building 4 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (f) Building 4 hand application of mineral spirits for cleaning purposes plant-wide, exhausting inside the building.

NOTE: The source-wide capacity of the Building 3 and Building 4 production lines is 2.4 units per hour combined.

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

- (9) One (1) flat wood panel lamination process (L1), using roller coating application, constructed 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 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 at the glue stations;
- (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 the glue

stations to limit overspray.

- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from the glue station 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 (Building 3 and Building 4), 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, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives (Building 3 and Building 4), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (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, including solvent and diluent usage, minus the VOC solvent shipped out, to the Glue Operations in Building 3 and Building 4, the Sealant & Adhesive Usage in Building 3 and Building 4, the Cleaning Solvent Usage and Miscellaneous Clean Up Operations in Buildings 3 and 4 and the 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.

(b) The amount of single and total HAPs delivered by the Glue Operations in Building 3 and Building 4, the Sealant & Adhesive Usage in Building 3 and Building 4, the Miscellaneous Clean Up Operations in Building 3 and Building 4 and the flatwood panel lamination process shall be limited such that the source wide single HAP and total HAPs emissions shall not exceed 9.50 and 24.5 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.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) 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.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of

the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

- (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
- (B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed with 90 days of the issuance of this permit.
- (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:
 - (i) A change in coating selection or formulation, "as supplied" or "as applied", or a change in solvent selection or formulation, or
 - (ii) An operational change in the coating application or cleanup operations.

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

- (2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
 - (3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
 - (d) Compliance with the VOC input limitations contained in D.1.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.
 - (e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC}_{\text{input}} = \text{SCL} - \text{SR}$$

Where:

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

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

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

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and to document the quantity of any VOC shipped offsite and deducted from the total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase order, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) If the amount of VOC in waste material is being deducted from the VOC input as allowed in Paragraph B of Condition D.1.3, then the following records shall be maintained:
 - (A) The amount of VOC containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
 - (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
 - (C) The weight of the VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an authorized individual as defined by 326 IAC 2-1.1-1(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):
- (1) Two (2) stick welders with particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day per unit.
 - (2) Two (2) woodworking operations, identified as P3DC and P4DC, 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.
 - (3) 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(e)(2), the allowable PM emission rate from the woodworking operations, identified as P3DC and P4DC, which has a total process weight rate of 4,000 pounds per hour shall not exceed 6.52 pounds per hour.

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

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

In order to comply with Condition D.1.1, the baghouse for particulate control shall be in operation and control emissions from the wood working operations, identified as P3DC and P4CD, at all times that the wood working operation is in operation.

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

D.2.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of the baghouses and dust collector associated with the wood working operation, P3DC and P4DC, when venting to the atmosphere. A baghouse and dust collector inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description:

Building 3

- (a) Building 3 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spary application method and exhausting inside of the building.

Under 40 CFR, Subpart HHHHHH, the glue stations are an affected source.

Building 4

- (d) Building 4 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, exhausting inside the building.

Under 40 CFR, Subpart HHHHHH, the glue stations are an affected source.

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

National Emissions Standards for Hazardous Air Pollutants [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to NESHAP HHHHHH [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.6590, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1 except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH.

E.1.2 National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH] [326 IAC 20]

Pursuant to 40 CFR Part 63, Subpart HHHHHH, the Permittee shall comply with the provisions of Standards of Performance for National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

The full text of Subpart HHHHHH may be found in Attachment A to this permit.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170(a)(2), (b)
- (3) 40 CFR 63.11171(a), (b), (e)
- (4) 40 CFR 63.11172(b)
- (5) 40 CFR 63.11173(e), (g)(2), (g)(3)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176(a)
- (9) 40 CFR 63.11177(a) through (d), (g)
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, Indiana 46540
FESOP Permit No.: F039-30646-00444

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, Indiana 46540
FESOP Permit No.: F039-30646-00444

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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: _____

**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: Building 3 and Building 4 Glue Operation

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	VOC Shipped Out
	This Month	Previous 11 Months	12 Month Total	
Month 1				
Month 2				
Month 3				

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

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

FESOP Quarterly Report

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

Facility: Building 3 and Building 4 Sealant & Adhesive Usage

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: _____

**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: Building 3 and Building 4 Glue Operations
Building 3 and Building 4 Sealant & Adhesive Usage
Building 3 and Building 4 Cleaning Solvent Usage
Flatwood Panel Lamination Operation

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: _____

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: Building 3 and Building 4 Glue Operations
 Building 3 and Building 4 Sealant & Adhesive Usage
 Building 3 and Building 4 Cleaning Solvent Usage
 Flatwood Panel Lamination Operation

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 9.5 and 24.5 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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 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, Indiana 46540
 FESOP Permit No.: F039-30646-00444

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

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No Deviations Occurred this Reporting Period".</p>	
<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: _____

**Winnebago of Indiana, Inc.
201 14th Street
Middlebury, Indiana 46540**

Attachment A

**National Emissions Standards for Hazardous Air Pollutants:
Paint Stripping and Miscellaneous Surface Coating Operations at
Area Sources**

40 CFR 63, Subpart HHHHHH

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)

[Browse Previous](#) | [Browse Next](#)

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Source: 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

§ 63.11170 Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

- (1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.
- (2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.
- (3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

§ 63.11171 How do I know if my source is considered a new source or an existing source?

- (a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.
- (b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.
- (1) Mixing rooms and equipment;
 - (2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;
 - (3) Spray guns and associated equipment;
 - (4) Spray gun cleaning equipment;
 - (5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
 - (6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.
- (c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

General Compliance Requirements

§ 63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

§ 63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

§ 63.11174 What parts of the General Provisions apply to me?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's

name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

§ 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the

requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

§ 63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

§ 63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Administrator means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

Aerospace vehicle or component means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

Airless and air-assisted airless spray mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- (3) Adhesives, sealants, maskants, or caulking materials.
- (4) Temporary protective coatings, lubricants, or surface preparation materials.
- (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

Compliance date means the date by which you must comply with this subpart.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

Dry media blasting means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

Electrostatic application means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Equipment cleaning means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

Facility maintenance means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

High-volume, low-pressure (HVLP) spray equipment means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Initial startup means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

Materials that contain HAP or HAP-containing materials mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous parts and/or products means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

Paint stripping and/or miscellaneous surface coating source or facility means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Painter means any person who spray applies coating.

Plastic refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

Protective oil means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and laboratory activities means surface coating or paint stripping activities that meet one of the following criteria:

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
- (2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.
- (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

Solvent means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

Space Vehicle means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

Spray-applied coating operations means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

- (1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Surface preparation or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Target HAP containing coating means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

Transfer efficiency means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

Truck bed liner coating means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	

§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates

			and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting— Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown,

			and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the Technical Support Document (ATSD) for a
Federal Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Winnebago of Indiana, LLC
Source Location:	201 14th Street, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3792 (Travel Trailers and Campers)
Operation Permit No.:	F 039-30646-00444
Permit Reviewer:	Deborah Cole

On February 19, 2012, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Winnebago of Indiana, LLC had applied for a FESOP Renewal to continue to operate a stationary towable recreational vehicle manufacturing operation. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

On October 27, 2010, the Indiana Air Pollution control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule cites listed in the permit. These changes are not changes to underlying provisions. As a result of these rule cite changes, IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as strikeouts and new language **bolded**.

Change 1 IDEM, OAQ, has clarified the rule cites for the Preventive Maintenance Plan, Section B.

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...

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

...

SECTION B GENERAL CONDITIONS

...

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

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

...

Change 2 IDEM, OAQ has clarified the rule cites for Operational Flexibility, Section B.

SECTION B GENERAL CONDITIONS

...

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) ~~through (d)~~ **and (c)** without a prior permit revision, if each of the following conditions is met:

...

(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)(2), (c)(1), ~~and d~~ **(b)(1) and (c)**. 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 ~~(b)(2), (c)(1), and d~~ **(b)(1) and (c)**.

(b) Emission Trades [326 IAC 2-8-15~~(c)~~**(b)**]
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(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15~~(d)~~**(c)**]
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.

...

Change 3 IDEM, OAQ, has decided to add specific language from the FESOP rules regarding monitoring record keeping, Section C.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

...

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

C.15 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. **Support information includes the following:**

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.

...

Change 4 IDEM, OAQ, has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions, Section C.

C.16 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. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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, Indiana 46540
FESOP Permit No.: F039-30646-00444

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No Deviations Occurred this Reporting Period".

...

IDEM Contact

- (a) Questions regarding this proposed FESOP Renewal can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Winnebago of Indiana, LLC
Source Location:	201 14th Street, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3792 (Travel Trailers and Campers)
Permit Renewal No.:	F039-30646-00444
Permit Reviewer:	Deborah Cole

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Winnebago of Indiana, LLC relating to the operation of a stationary towable recreational vehicle manufacturing operation. On June 20, 2011, Winnebago of Indiana, LLC submitted an application to the OAQ requesting to renew its operating permit. Winnebago of Indiana, LLC was issued its first FESOP (F039-24096-00444) on March 19, 2001.

At the request of the source, the emission unit descriptive language has been modified in this permit renewal to eliminate outdated emission unit labels. Also at the request of the source, several outdated processes were also removed during this renewal and are listed in the section entitled "Emission Units and Pollution Control Equipment Removed from the Source"

Permitted Emission Units and Pollution Control Equipment

The source consists of four buildings:

- a) Building 1 houses the offices and is not a production plant
- b) Building 2 is a warehouse and not a production plant
- c) Building 3 is a production plant
- d) Building 4 is a production plant

Building 3 and Building 4 house the fabrication operations and contain the following permitted emission units and pollution control devices:

Building 3

- (a) Building 3 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside of the building.

Under 40 CFR, Subpart HHHHHH, the glue stations are an affected source.

- (b) Building 3 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting inside the building.

Building 4

- (d) Building 4 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside the building.

Under 40 CFR, Subpart HHHHHH, the glue stations are an affected source.

- (e) Building 4 Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting inside the building.
- (f) Building 4 hand application of mineral spirits for cleaning purposes plantwide, exhausting inside the building.

NOTE: The source-wide capacity of the Building 3 and Building 4 production lines is 2.4 units per hour combined.

Insignificant Activities

The source also consists of the following insignificant activities:

- (1) Two (2) stick welders with particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day per unit.
- (2) Two (2) woodworking operations, identified as P3DC and P4DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per 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 1,104 pounds per hour.
- (3) 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).
- (4) One (1) flat wood panel lamination process, using roller coating application, constructed in 2011, with a maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.
- (5) 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]
- (6) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (7) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (a) One (1) natural gas fired heater, identified as SB-023, with a maximum heat input rate of 0.4 MMBtu/hr.
 - (b) One (1) natural gas fired heater, identified as SB-016, with a maximum heat input rate of 0.08 MMBtu/hr.
 - (c) 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.
 - (d) 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.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (1) 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.
- (2) 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.
- (3) One (1) Metal Coating Operation consisting of hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
- (4) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (5) 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.

Existing Approvals

Since the issuance of the FESOP (039-34096-00440) on March 19, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. (039-30111-00444) issued on January 27, 2011; and
- (b) Administrative Amendment No. (039-30424-00444) issued on April 27, 2011

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	0.44
PM ₁₀	0.51
PM _{2.5}	0.50
SO ₂	0.01
NO _x	1.51
VOC	111.33
CO	1.27
GHGs as CO ₂ e	1,819.07
Single HAP	19.31
Total HAP	47.06

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	HAPs	
4 Glue Stations in Building 3 4 Glue Stations in Building 4	0	0	0	0	0	97.8	0	0	Single HAP = 9.50 Total HAPs = 24.5	
Sealant & Adhesive Usage in Building 3 Sealant & Adhesive Usage in Building 4	0	0	0	0	0		0	0		
Cleaning Solvent Usage in Building 3 Cleaning Solvent Usage in Building 4	0	0	0	0	0		0	0		
Lamination (L1)	0.11	0.11	0.11	0	0		0	0		
Wood Working	0.27	0.27	0.27	0	0	0	0	0	0	0
Welding	0.01	0.01	0.01	0	0	0	0	0	0	0
Natural Gas Combustion	0.03	0.11	0.11	0.01	1.51	0.08	1.27	1,819.07	0.03 (single)	0.03 (total)
Vehicular Traffic - Paved Roads	0.03	0.01	0	0	0	0	0	0	0	0
Total PTE of Entire Source	0.44	0.51	0.49	0.01	1.51	97.88	1.27	1,819.07	47.06	19.34
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

FESOP

- (1) Pursuant to 326 IAC 2-8-4, the total volatile organic compounds (VOC) delivered to the Glue Operations in Building 3 and Building 4, the Sealant & Adhesive Usage in Building 3 and Building 4, the Cleaning Solvent Usage and Miscellaneous Clean Up Operations in Buildings 3 and 4 and the 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.

This is an existing requirement and this is not changed in this renewal

- (2) Pursuant to 326 IAC 2-8-4, the amount of single and total HAPs delivered by the Glue Operations in Building 3 and Building 4, the Sealant & Adhesive Usage in Building 3 and Building 4, the Miscellaneous Clean Up Operations in Building 3 and Building 4 and the flatwood panel lamination process shall be limited such that the source wide single HAP and total HAPs emissions shall not exceed 9.5 and 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

The source had existing HAP limits of 9.0 tons per twelve (12) consecutive month period for a single HAP and 24.0 tons per twelve (12) consecutive month period for total HAPs.

During this review period, the source requested a revision of these limits to 9.5 tons per twelve month consecutive month period for a single HAP and 24.5 tons per twelve consecutive month period for total HAPs. This revision will allow for maximum production utilization.

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 (NESHAP) does not apply.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) 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.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), because this source produces only stationary towable recreational vehicle and does not meet the definition of wood furniture manufacturing.
- (c) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products) are not included in this permit because all the coatings applied on the recreation vehicle are subject to 40 CFR 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products). The only coatings activities that may be subject to 40 CFR 63, Subpart MMMM are the coating of the underbody parts. However this source does not coat any underbody parts for recreation vehicle.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products) are not included in this permit because this source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. See the State Rule Applicability – Entire Source 326 IAC 2-8 Section below. Compliance date for 40 CFR 63, Subpart PPPP is April 19, 2007.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products (40 CFR 63, Subpart QQQQ), because this source produces only stationary towable recreational vehicle and does not meet the definition of Wood Building Products.
- (f) The source is subject to the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63.11169, Subpart HHHHHH), because it is considered an area source that utilizes spray application of coatings for mobile equipment, as defined in 40 CFR 63.11180. This source performs spray coating of parts for motor vehicle and mobile equipment which are driven on the road for the recreational vehicle (trailer and camping) industries.

An applicability review of 40 CFR 63, Subpart HHHHHH done for Second Administrative Amendment 039-30424-00444, issued on April 27, 2011, stated that requirements of 40 CFR 63.11169, Subpart HHHHHH are not applicable to this source because the 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.

The source does not paint strip with any chemical stripper that contains methylene chloride (MeCl) nor does it perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

However, the source does perform spray applications of coatings to "mobile equipment", as defined by §63.11180. Therefore, they are subject to this NESHAP.

The source submitted an initial notification and a petition for exemption on January 3, 2011 to U.S. EPA with a copy to IDEM. This petition was submitted because there is no paint stripping operations which use methylene chloride at the source and none of the coatings used contain compounds of chromium, lead, manganese, nickel or cadmium.

This is a new requirement in the permit and is a Title 1 change.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170(a)(2), (b)
- (3) 40 CFR 63.11171(a), (b), (e)
- (4) 40 CFR 63.11172(b)
- (5) 40 CFR 63.11173(e), (g)(2), (g)(3)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176(a)
- (9) 40 CFR 63.11177(a) through (d), (g)
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

Nonapplicable portions of the NESHAP will not be included in the permit. This NESHAP does not require performance testing.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the unit except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 326 IAC 20; 40 CFR Part 61 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

326 IAC 2-2 (Prevention of significant Deterioration (PSD))

PSD applicability is discussed under the PTE of Entire Source After Issuance for the FESOP section above.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-1 (FESOP)

FESOP applicability is discussed under the PTE of Entire Source After Issuance for the FESOP section above.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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).

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

State Rule Applicability – Glue Operation, Sealant and Adhesive Usage

Glue Operations and Adhesive Usage

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

The Building 3 and Building 4 Glue Operations and the Building 3 and Building 4 Sealant & Adhesive Usage were determined to be subject to 326 IAC 8-1-6 (BACT). This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). IDEM, OAQ determined the following to be BACT requirements to these operations as follows:

- (a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application in Building 3 and Building 4 Glue Operations.
- (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 to limit overspray.
- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from 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.

This is an existing requirement which was initially determined in Part 70 Operating Permit No. 039-7803-00444, issued on October 12, 1998, and Significant Permit Modification, 039-19129-00444, issued on September 17, 2004 and this is not changed in this renewal.

Flat Wood Panel

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 the flat wood panel lamination process and cleaning operation because this is not a miscellaneous metal or plastic parts coating operation.

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 8-2-10 (Flat wood panels; manufacturing operations)

The source is not subject to the requirements of 326 IAC 8-2-10 because the flat wood lamination process, by means of roller coating, applies glue to wood panels and does not manufacture the wood panels.

326 IAC 8-2-12 (Wood furniture and Cabinet Coating)

The source is not subject to the requirements of 326 IAC 8-2-12 because the source does not coat wood furnishings such as cabinets (kitchen, bath and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coated furnishings made of solid wood, wood composition or simulated wood.

326 IAC 6-3-1 (Particulate)

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

State Rule Applicability – Metal Surface Coating

326 IAC 7-2-9 ((Miscellaneous Metal Coating)

The source is no longer subject to the requirements of 326 IAC 7-2-9 (Miscellaneous Metal Coating Operations) because it no longer does any coating of metal parts.

State Rule Applicability – Woodworking Operations

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

Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate from the woodworking operations, identified as P3DC and P4DC, which has a total process weight rate of 4,000 pounds per hour shall not exceed 6.52 pounds per hour.

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

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

$$E = 4.10 * (2.0)^{0.67} = 6.52 \text{ lbs PM/hour}$$

The baghouse shall be in operation at all times the wood working operation are in operation in order to comply with this limit.

State Rule Applicability – Welding and Brazing

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9) (Particulate Emission Limitations for Manufacturing Processes) the two (2) stick welders consume less than six hundred twenty-five (625) pounds of weld wire or rod per day total. Therefore, the requirements of 326 IAC 6-3-1 are not applicable.

326 IAC 6-3-2 (Particulate Emissions Limitations; Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations; Work Practices and Control Technologies) the potential particulate emissions from the following units are all less than 0.551 pounds per hour:

1. Brazing equipment
2. Cutting torches
3. Soldering equipment

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Parameters	Frequency	Range	Excursions and Exceedances
Wood Working Operations P3DC	Baghouse Inspections	Quarterly	Normal-Abnormal	Response Steps
Wood Working Operations P4DC	Baghouse Inspections	Quarterly	Normal-Abnormal	Response Steps

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 20, 2011. Additional information was received on November 22 and 23, 2011.

Conclusion

The operation of this stationary towable recreational vehicle manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. 039-30646-00444.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Emissions Summary**

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

Criteria Pollutants: Unrestricted Potential Emissions									Criteria Pollutants: Limited Potential to Emit									
Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG	Single HAP	Total HAP
Solvent Usage	0.00	0.00	0.00	0.00	0.00	111.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	97.80	0.00	0.00	9.00	24.00
WoodWorking (WW)	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lamination (L1)	0.11	0.11	0.11	0.00	0.00	0.00	0.00	0.00	0.11	0.11	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Heating (H1-H13)	0.03	0.11	0.11	0.01	1.51	0.08	1.27	1,819.07	0.03	0.11	0.11	0.01	1.51	0.08	1.27	1,819.07	0.03	0.00
Welding	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicular Traffic (VT)	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTALS	0.44	0.51	0.50	0.01	1.51	111.33	1.27	1,819.07	0.44	0.51	0.50	0.01	1.51	97.88	1.27	1,819.07		

*Toluene as Determined Below

HAZARDOUS AIR POLLUTANTS

Emission Units	Ethyl Benzene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Cumene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Hexane Emissions (ton/yr)	MIBK Emissions (ton/yr)	Single HAP Emissions (tons/yr)	Total HAP Emissions (ton/yr)
Solvent Usage	1.13	0.00	1.13	0.19	0.00	19.31	11.87	13.30	0.00	19.31	46.92
WoodWorking (WW)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lamination (L1)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Heating (H1-H13)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.03	0.03
Welding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicular Traffic (VT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions (TPY) by HAP	1.13	0.00	1.13	0.19	0.00	19.31	11.87	13.33	0.00	19.34	46.95

Appendix: Emissions Calculations
VOC and Particulate
From Miscellaneous Solvent Usage Operations
Fabrication Lines (P3 & P4)

Company Name: Winnebago of Indiana, LLc
 Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
 FESOP: 039-30646-00444
 Prepared By: Deborah Cole
 Date: March 26, 2012

Material	Density (Lb/Gal)	Weight % Organics	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Transfer Efficiency
BSI Econobond 29	5.76	54.0%	0.831	2.400	3.11	6.203	148.88	27.171	100%
BSI 76 Web Adhesive	5.84	65.0%	0.211	2.400	3.80	1.922	46.14	8.420	100%
Mineral Spirits	6.47	100.0%	0.481	2.400	6.47	7.469	179.26	32.714	100%
1010 Rubber Roof Sealant	9.59	32%	0.598	2.400	3.07	4.404	105.70	19.291	100%
Sikaflex 221	9.9	4.43%	1.600	2.400	0.44	1.69	40.54	7.40	100%
Sikaflex 252	10.0	4.48%	0.400	2.400	0.45	0.43	10.33	1.89	100%
Plastic Pipe Cement	7.09	80.000%	0.102	2.400	5.672	1.391	33.389	6.094	100%
Geocel Proflex Sealant	7.93	5.3%	0.450	2.400	0.42	0.45	10.9	1.99	100%
Polyseamseal Painters Caulk	13.85	15.02%	0.250	2.400	2.080	1.248	29.96	5.467	100%
Aerosol Touch-up Paint	5.59	65.00%	0.013	2.400	3.634	0.109	2.62	0.477	65%
Solvent Cleaner	6.52	100%	0.005	2.400	6.52	0.078	1.9	0.34	100%

PM Control Efficiency: 100.00%

Potential Emissions

Uncontrolled	25.40	609.6	111.2
Controlled	25.40	609.6	111.2

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emissions From Surface Coating Booths**

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %						Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Hexane (ton/yr)	Total HAPs (ton/yr)
				Xylene	Toluene	Cumene	Ethyl Benzene	Styrene	Hexane							
BSI Econobond 29	5.76	0.831	2.400	0.00%	0.00%	0.00%	0.0%	0.00%	20.00%	0.000	0.00	0.00	0.000	0.00	10.06	10.063
BSI 76 Web Adhesive	5.84	0.211	2.400	0.00%	0.00%	0.00%	0.0%	0.00%	25.00%	0.000	0.00	0.00	0.000	0.00	3.24	3.238
Sikaflex 221	9.93	1.600	2.400	4.40%	0.00%	0.00%	0.0%	0.00%	0.00%	7.349	0.00	0.00	0.000	0.00	0.00	7.349
Sikaflex 252	10.01	0.400	2.400	4.50%	0.0%	0.00%	0.00%	0.00%	0.0%	1.894	0.000	0.00	0.00	0.00	0.000	1.894
Rubber Roof Sealant	9.60	0.598	2.400	0.00%	32.00%	0.00%	0.00%	0.00%	0.00%	0.000	19.31	0.00	0.00	0.00	0.00	19.311
Geocel Proflex Sealant	7.93	0.450	2.400	7.00%	0.00%	3.00%	3.00%	0.00%	0.00%	2.626	0.00	1.13	1.13	0.00	0.00	4.877
Patch Reducer	8.40	0.003	2.400	0.00%	0.00%	0.00%	0.00%	70.00%	0.00%	0.000	0.00	0.00	0.00	0.19	0.00	0.185
Aerosol Spray Paint	5.59	0.013	2.400	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.11	0.00	0.00	0.00	0.00	0.115
Mineral Spirits	6.74	0.481	2.400	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.003	0.00	0.00	0.00	0.00	0.00	0.003
Solvent Cleaner	6.52	0.005	2.400	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.07	0.00	0.00	0.00	0.00	0.069
										11.87	19.43	1.125	1.13	0.185	13.302	47.04

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Woodworking Operations (P3DC-P4DC)**

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

Unit ID/Control Device	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
P3-WW	97.5%	0.0005	7712	1.37	6.0	0.034	0.151
P4-WW	99.0%	0.0005	6460	2.769	12.13	0.028	0.121
Total				4.144	18.149	0.062	0.272

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
2.00	6.5

326 IAC 6-3-2(e) Allowable Rate of Emissions

Wood Working	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Wood	4,000	2.000	6.523	28.572

Methodology

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^{0.67}

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Appendix A: Emissions Calculations
VOC and Particulate
Sidewall Lamination (L-1)

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

Process	Manufacturer	Product Number	Use	Description	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	Hinkel	Pur-Fect Lok	Adhesive	Side Wall Lamination 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	IFS Industries	2352	Cleaner	Lamination Equipment Cleaning	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	Manufacturer	Product Number	Use	Description	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	Hinkel	Pur-Fect Lok	Adhesive	Side Wall Lamination 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	0.00
*Lamination	IFS Industries	2352	Cleaner	Lamination Equipment Cleaning	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	0.00

Uncontrolled Potential Emissions															0.00	0.00	0.00	0.00	0.00	0.00
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METHODOLOGY

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

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)

SA = Exposed Surface Area (Square Meters Exposed/Day)

Adhesive	Use	Units Annual (Average Size)	Maximum Area Coated Annual (ft ²)	Maximum Area Coated per Day (ft ²)	Maximum Exposed Area M ² /Day	Units	Emissions grams/day per Formula
Pur-Fect Lok 834A	Side Wall Coverage	5950 sl/hr 230 sl/unit	4,462,500	12,226.03	<u>1,135.83</u>	<u>M2</u>	<u>1.49E-04</u>

t_{TF} = Tack Free Time in Seconds (Default = 5 Seconds)

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

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

METHODOLOGY

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

Formula - PM (from Stack Test data)

Assume TSP=PM10

TSP = 0.0056 gr/scf

Flowrate = 500 acfm

Flowrate x Grain Loading x 8760 hrs/yr = lbs/yr

Potential PM10 **211.74 lbs/yr**
0.02 lbs/hr
0.11 tons/hr

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

Company Name: Winnebago of Indiana, LLC
Address: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: January 4, 2012

Unit	Heat Input
SB-016 (H1)	0.08
SB017 - SB022 (H)	0.960
SB-023 (H8)	0.400
SV25 - SV29 (H9-	2.000
Total	3.44

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.4	1000	30.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.029	0.115	0.115	0.009	1.507	0.083	1.266

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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

See page 2 for HAPs emissions calculations.

updated 7/11

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

Company Name: Winnebago of Indiana, LLc
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

HAPs - Organics						TOTAL HAP
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	0.000032	0.000018	0.001130	0.027121	0.000051	0.028352

HAPs - Metals						TOTAL HAP
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	0.00001	0.00002	0.00002	0.00001	0.00003	0.00008

0.03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

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

Greenhouse Gas Emissions

**Company Name: Winnebago of Indiana, LLc
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,808	0.0	0.0
Summed Potential Emissions in tons/yr	1,808		
CO2e Total in tons/yr	1,819		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

Company Name: Winnebago of Indiana, LLC
 Address City IN Zip: 201 14th Street, Middlebury, IN 46540
 Permit No.: F039-30646-00444
 Reviewer: Deborah Cole
 Date: 3/26/2012

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Stick (FUG-41)	1	0.03125	0.037	0.003	0.00	0.00	0.001	0.000	0.00	0.00	0.000
Stick (FUG-42)	1	0.03125	0.037	0.003	0.00	0.00	0.001	0.000	0.00	0.00	0.000
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.00	0.00	0.00	0.00	0.00
Potential Emissions lbs/day							0.06	0.00	0.00	0.00	0.00
Potential Emissions tons/year							0.01	0.00	0.00	0.00	0.00

METHODOLGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
Permit Number: 039-30646-00444
Prepared By: Deborah Cole
Date: March 26, 2012

Paved Roads at Industrial Site

The following calculations determine the amount of emissions from paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	10.0	10.0	12.0	120.0	125	0.024	0.2	86.4
Vehicle (leaving plant) (one-way trip)	1.0	10.0	10.0	12.0	120.0	125	0.024	0.2	86.4
			0		0		0	0	0
Total			20.0		240.0			0.5	172.8

Average Vehicle Weight Per Trip = $\frac{12.0}{1}$ tons/trip
 Average Miles Per Trip = $\frac{0.02}{1}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	12.0	12.0	12.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m ² = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.299	0.058	0.008	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.274	0.053	0.008	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.3E-02	2.5E-03	3.6E-04	1.2E-02	2.3E-03	3.3E-04	8.3E-03	1.1E-03	1.6E-04
Vehicle (leaving plant) (one-way trip)	1.3E-02	2.5E-03	3.6E-04	1.2E-02	2.3E-03	3.3E-04	5.9E-03	1.1E-03	1.6E-04
	0	0	0	0	0	0	0	0	0
	0.026	0.01	0.00	0.02	0.00	0.00	0.01	0.00	0.00

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PTE = Potential to Emit

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / 5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]



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 Street
Middlebury, IN 46540

DATE: March 26, 2012

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

SUBJECT: Final Decision
Federally Enforceable State Operating Agreement Renewal
039-30646-00444

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., Responsible Official
Doug Elliott, Consultant
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



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

March 26, 2012

TO: Middlebury Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Winnebago of Indiana, LLC
Permit Number: 039-30646-00444

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	PWAY 3/26/2012 Winnebago of Indiana LLC 039-30646-00444 (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)									
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		Middlebury Public Library 101 East Winslow, P.O. Box 192 Middlebury IN 46540-0192 (Library)									
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
8		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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