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: December 30, 2011

RE: K-Z, Inc. / 087-30957-00063

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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New Source Review and Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

K-Z, Inc.
9270 West US 20,
Shipshewana, Indiana 46565

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

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

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

Operation Permit No.: M 087-30957-00063	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2011 Expiration Date: December 30,2021

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers source.

Source Address:	9270 West US 20, Shipshewana, Indiana 46565
General Source Phone Number:	(260) 768-4016
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition

This source consists of nine (9) plants as issued in the permit number 087-21974-00063, on January 12, 2007. These plants are located on two properties, and these two properties are located adjacent to each others.

A.3 Emission Units and Pollution Control Equipment Summary

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

Plant 1:

(a) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10,000 pounds of wood per hour, exhausting through general ventilation.

(b) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

(a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3,000 pounds of wood per hour, exhausting through general ventilation.

(b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.

(c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

(a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

(a) One (1) flow coating laminator, identified as EUL-7A, constructed in January 2011, with a maximum capacity of 24 units per hour, using no control, and exhausting to indoors.

(b) One (1) small paint repair area, identified as EUPR, constructed in January 2011, with a maximum capacity of less than 1 unit per hour of metal parts, using no control, and exhausting to indoors.

(c) Three (3) welding stations, constructed in 2011, identified as EUC-7A, EUC-7B and EUC-7C, exhausting through general ventilation.

Plant 5:

(a) One (1) RV assembly operation, constructed in February 1999 and approved for modification in 2011, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 3 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7,800 pounds of wood per hour, exhausting through general ventilation.

(c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.

(d) One (1) 0.5 MMBtu/hr direct natural gas-fired industrial heater, installed in 2008 identified as EUD-5A.

Plant 6:

(a) One (1) RV assembly operation, constructed in April 2004 and approved for modification in 2011, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic, assembling 0.75 units per hour, exhausting through general ventilation

(b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2,800 pounds of wood per hour, exhausting through general ventilation.

(c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Plant 7A:

(a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.88 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4,900 pounds of wood per hour, exhausting through general ventilation.

(c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

(a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 1.13 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6,300 pounds of wood per hour, exhausting through general ventilation.

(c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

(a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.75 units per hour, exhausting through general ventilation.

(b) Woodworking operations, identified as EUA-19, using 4,200 pounds of wood per hour, exhausting through general ventilation.

Note: The particulate emissions from woodworking operations from each plant are controlled by a baghouse, except Plant 2 is controlled by a cyclone.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M 087-30957-00063, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

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

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

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) 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 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.

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

(a) All terms and conditions of permits established prior to M 087-30957-00063 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

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

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

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

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1:

(c) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10,000 pounds of wood per hour, exhausting through general ventilation.

(d) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

(a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3,000 pounds of wood per hour, exhausting through general ventilation.

(b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.

(c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

(a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

(a) One (1) flow coating laminator, identified as EUL-7A, constructed in January 2011, with a maximum capacity of 24 units per hour, using no control, and exhausting to indoors.

(b) One (1) small paint repair area, identified as EUPR, constructed in January 2011, with a maximum capacity of less than 1 unit per hour of metal parts, using no control, and exhausting to indoors.

(c) Three (3) welding stations, constructed in 2011, identified as EUC-7A, EUC-7B and EUC-7C, exhausting through general ventilation.

Plant 5:

(a) One (1) RV assembly operation, constructed in February 1999 and approved for modification in 2011, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 3 units per hour, exhausting through general ventilation

(b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7,800 pounds of wood per hour, exhausting through general ventilation.

(c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.

(d) One (1) 0.5 MMBtu/hr direct natural gas-fired industrial heater, installed in 2008 identified as EUD-5A.

Plant 6:

(a) One (1) RV assembly operation, constructed in April 2004 and approved for modification in 2011, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic, assembling 0.75 units per hour, exhausting through general ventilation

(b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2,800 pounds of wood per hour, exhausting through general ventilation.

(c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Plant 7A:

(a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.88 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4,900 pounds of wood per hour, exhausting through general ventilation.

(c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

(a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 1.13 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6,300 pounds of wood per hour, exhausting through general ventilation.

(c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

(a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.75 units per hour, exhausting through general ventilation.

(b) Woodworking operations, identified as EUA-19, using 4,200 pounds of wood per hour, exhausting through general ventilation.

Note: The particulate emissions from woodworking operations from each plant are controlled by a baghouse, except Plant 2 is controlled by a cyclone.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2, the allowable PM, PM10 and PM2.5 emission rate from woodworking operations shall not exceed the following:

Location	Emissions units ID	PM Limitation (lb/hr)	PM10 Limitation (lb/hr)	PM2.5 Limitation (lb/hr)
Plant 1	EUA-1	12.05	7.0	7.0
Plant 2	EUA-2	5.38	2.8	2.8
Plant 5	EUA-5	10.20	2.8	2.8
Plant 6	EUA-6	5.14	2.8	2.8
Plant 7A	EUA-7A	7.47	2.8	2.8
Plant 7B	EUB-7B	8.84	2.8	2.8
Plant 19	EUB-19	6.74	2.8	2.8

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the seven (7) natural gas-fired boilers, identified as EUD-1, EUD-2, EUD-3, EUD-5, EUD-6, EUD-7A, EUD-7B, each rated at 150,000 Btu/hr, each shall not exceed six-tenths (0.6) pounds per million British thermal units (MMBtu).

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from woodworking operations shall not exceed the following:

Location	Emissions units ID	Weight Rate (lb/hr)	Weight Rate (tons/hr)	PM Limitation (lb/hr)
Plant 1	EUA-1	10,000	5	12.05
Plant 2	EUA-2	3,000	1.5	5.38
Plant 5	EUA-5	7,800	3.9	10.20

Location	Emissions units ID	Weight Rate (lb/hr)	Weight Rate (tons/hr)	PM Limitation (lb/hr)
Plant 6	EUA-6	2,800	1.4	5.14
Plant 7A	EUA-7A	4,900	2.45	7.47
Plant 7B	EUB-7B	6,300	3.15	8.84
Plant 19	EUB-19	4,200	2.1	6.74

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

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

D.1.4 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 requirements not applicable, the VOC input, including coatings, dilution and cleaning solvents, to the assembly operation, EUB-5, in Plant 5, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.6 Particulate Control

In order to comply with Conditions D.1.1 and D.1.3, the baghouse and cyclone for particulate control shall be in operation and control emissions from the woodworking at all times when the woodworking is in operation.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of the baghouse and cyclone controlling the woodworking operations when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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

(2) The amount of assembly material and solvent used on a monthly basis.

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

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

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by the condition.

D.1.10 Reporting Requirements

A quarterly report to document the compliance status with D.1.4 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.

Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch

Quarterly Report

Source Name: K-Z, Inc.
Source Address: 9270 West US 20, Shipshewana, Indiana 46565
MSOP Permit No.: M 087-30957-00063
Facility: Assembly operation, EUB-5, in plant 5
Pollutant: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

Year: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	K-Z, Inc.
Address:	9270 West US 20
City:	Shipshewana, Indiana 46565
Phone #:	(260) 768-4016
MSOP #:	M 087-30957-00063

I hereby certify that K-Z, Inc. is:
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that K-Z, Inc. is:
- ☐ in compliance with the requirements of MSOP M 087-30957-00063.
- ☐ not in compliance with the requirements of MSOP M 087-30957-00063.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Review and Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	**K-Z, Inc.**
Source Location:	**9270 West US 20, Shipshewana, IN 46565**
County:	**LaGrange**
SIC Code:	**3792 (Travel Trailers and Campers)**
Permit Renewal No.:	**M 087-30957-00063**
Permit Reviewer:	**Renee Traivaranon**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from K-Z, Inc. relating to the operation of an existing manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers source**.** On September 22, 2011, K-Z, Inc. submitted an application to the OAQ requesting to renew its operating permit. K-Z, Inc was issued a New Source Construction and Minor Source Operating Permit (MSOP) on January 12, 2007.

Source Definition

This source consists of nine (9) plants and permitted as one source under permit number 087-21974-00063, issued on January 12, 2007. These plants are located on two properties, and these two properties are located adjacent to each others.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Plant 1:

(a) Woodworking operations, constructed in July 2000, identified as EUA-1, using 10,000 pounds of wood per hour, exhausting through general ventilation.
(b) One (1) natural gas-fired boiler, constructed in 1999, identified as EUD-1, rated at 150,000 Btu per hour.

Plant 2:

(a) Woodworking operations, constructed in July 2000, identified as EUA-2, using 3,000 pounds of wood per hour, exhausting through general ventilation.
(b) One (1) welding operation, constructed in July 2000, identified as EUC-2, using 0.4 pounds per hour of weld wire, exhausting through general ventilation.
(c) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-2, rated at 150,000 Btu per hour.

Plant 3:

(a) One (1) natural gas-fired boiler, constructed in 2000, identified as EUD-3 rated at 150,000 Btu per hour.

Plant 4:

(a) One (1) flow coating laminator, identified as EUL-7A, constructed in January 2011, with a maximum capacity of 24 units per hour, using no control, and exhausting to indoors.
(b) One (1) small paint repair area, identified as EUPR, constructed in January 2011, with a maximum capacity of less than 1 unit per hour of metal parts, using no control, and exhausting to indoors.
(c) Three (3) welding stations, constructed in 2011, identified as EUC-7A, EUC-7B and EUC-7C, exhausting through general ventilation.

Note: The above units were added to this renewal permit. All existing emission units in Plant 4 were no longer in operation and they were removed from this renewal. (See Emission Units and Pollution Control Equipment Removed From the Source.)

Plant 5:

(a) One (1) RV assembly operation, constructed in February 1999 and approved for modification in 2011, identified as EUB-5, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 3 units per hour, exhausting through general ventilation.
(b) Woodworking operations, constructed in July 2000, identified as EUA-5, using 7,800 pounds of wood per hour, exhausting through general ventilation.
(c) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-5, rated at 150,000 Btu per hour.
(d) One (1) 0.5 MMBtu/hr direct natural gas-fired industrial heater, installed in 2008 identified as EUD-5A.

Note: The maximum capacity of the assembling, EUB-5, has been increased from 1.38 units to 3 units in this renewal permit.

Plant 6:

(a) One (1) RV assembly operation, constructed in April 2004 and approved for modification in 2011, identified as EUB-6, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, plastic, assembling 0.75 units per hour, exhausting through general ventilation.
(b) Woodworking operations, constructed in July 2000, identified as EUA-6, using 2,800 pounds of wood per hour, exhausting through general ventilation.
(c) Two (2) natural gas-fired thermo cyclers, constructed in 2004, identified as EUE-6, each rated at 480,000 Btu per hour.
(d) One (1) natural gas-fired boiler, constructed in 2004, identified as EUD-6, rated at 150,000 Btu per hour.

Note: The maximum capacity of the assembling, EUB-6, has been increased from 0.5 units to 0.75 units during the renewal in 2011.

Plant 7A:

(a) One (1) RV assembly operation, constructed in February 2005, identified as EUB-7A, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.88 units per hour, exhausting through general ventilation.

(b) Woodworking operations, constructed in July 2000, identified as EUA-7A, using 4,900 pounds of wood per hour, exhausting through general ventilation.
(c) Two (2) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7A, each rated at 480,000 Btu per hour.
(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7A, rated at 150,000 Btu per hour.

Plant 7B:

(a) One (1) RV assembly operation, constructed in March 2005, identified as EUB-7B, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 1.13 units per hour, exhausting through general ventilation.
(b) Woodworking operations, constructed in July 2000, identified as EUA-7B, using 6,300 pounds of wood per hour, exhausting through general ventilation.
(c) One (1) natural gas-fired thermo cyclers, constructed in 2005, identified as EUE-7B, rated at 480,000 Btu per hour.
(d) One (1) natural gas-fired boiler, constructed in 2005, identified as EUD-7B, rated at 150,000 Btu per hour.

Plant 19:

(a) One (1) RV assembly operation, constructed in January 2006, identified as EUB-19, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 0.75 units per hour, exhausting through general ventilation.
(b) Woodworking operations, identified as EUA-19, using 4,200 pounds of wood per hour, exhausting through general ventilation.

Note: Most of woodworking emissions are generated from the sawing, cutting of wood, as this is the main type of the woodworking at this source, according to the initial application, and most of the wood dust is generated from Plant1. The particulate emissions from woodworking operations from each plant are controlled by a baghouse, except Plant 2 is controlled by a cyclone, and then each exhausting through general ventilation. (See the type of control devices in Appendix A).

Also, this source does not coat metal parts in any plants except in Plant 4; therefore, the description of coating metal was removed from all other plants.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units in Plant 4 have been removed from this renewal since they are no longer in operation: (See also the new emission units in this plant 4 above.)

(a) One (1) RV assembly operation, constructed in April 2003, identified as EUB-4, which assembles RV from primarily pre-manufactured and pre-coated components using sealants, adhesives and caulks, coating wood, and plastic, assembling 1.63 units per hour, exhausting through general ventilation.
(b) Woodworking operations, constructed in July 2000, identified as EUA-4, using 9,100 pounds of wood per hour, exhausting through general ventilation.
(c) Two (2) natural gas-fired thermo cyclers, constructed in 2003, identified as EUE-4, each rated at 480,000 Btu per hour.

(d) One (1) natural gas-fired boiler, constructed in 2003, identified as EUD-4, rated at 150,000 Btu per hour.

Existing Approvals

This source has been operating under the following approvals:

(a) Notice of Change No. 087-27076-00063, issued on October 27, 2008

(b) MSOP No. 087-21974-00063, issued on January 12, 2007

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.

Note: In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. LaGrange 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) $PM_{2.5}$

LaGrange 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 SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

LaGrange County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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	92.75
PM_{10}	92.86
$PM_{2.5}$	92.86
SO_2	0.01
VOC	73.71
CO	1.68
NO_x	2.0
GHGs as CO_2e	2,432
Single HAP	8.7 (Toluene)
Total HAP	14.9

Appendix A of this TSD reflects the detail calculation of unrestricted potential emissions of the source.

MSOP Status:

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

(b) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not applicable to the seven (7) natural gas-fired Boilers, identified as emission units EUD-1, EUD-2, EUD-3, EUD-5, EUD-6, EUD-7A, EUD-7B, with a maximum heat input capacity of 150,000 Btu per hour each because each unit has a capacity less than the rule applicability threshold of 10 MMBtu per hour.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) The requirements of 40 CFR Part 63, Subpart JJ (National Emission Standard for Surface Coating of Wood Furniture) are not included in this permit because this source is not a major source as defined in 40 CFR Part 63, Subpart A.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM (326 IAC 20-80), are not included in the permit for the repair coating unit because this source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the natural gas-fired boilers, because gas-fired boilers, as define in 40 CFR 63.11237, are specifically exempted from this rule as indicated in 40 CFR 63.11195(e).

(f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, because this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal processes and the repair coatings used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) as defined in §63.11180.

(g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

The following state rules are applicable to this renewal:

(a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
The potential to emit PM, PM10 and PM2.5 (before control) of the entire source is greater than 250 tons per year. However, in order to render 326 IAC 2-2 not applicable, the allowable PM, PM10 and PM2.5 emission rate from woodworking operations shall not exceed the following:

Location	Emissions units ID	PM Limitation (lb/hr)	PM10 Limitation (lb/hr)	PM2.5 Limitation (lb/hr)
Plant 1	EUA-1	12.05	7.0	7.0
Plant 2	EUA-2	5.38	2.8	2.8
Plant 5	EUA-5	10.20	2.8	2.8
Plant 6	EUA-6	5.14	2.8	2.8
Plant 7A	EUA-7A	7.47	2.8	2.8
Plant 7B	EUB-7B	8.84	2.8	2.8
Plant 19	EUB-19	6.74	2.8	2.8

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

The baghouses and cycle shall be operation at all times to comply with these limits.

(b) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP status is discussed under the PTE of the Unrestricted Potential Emissions Section above.

(c) 326 IAC 2-3 (Emission Offset)
This source is located in an attainment area for each criteria pollutant, therefore, Emission Offset is not applicable to this source.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from this source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(e) 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.

(f) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

(g) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Boiler Operations

(a) 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

(1) Boiler EUD-1, rated at 150,000 Btu per hour, constructed in 1999, is subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 MMBtu/hr

Pt = $1.09 / (0.15)^{0.26} = 1.78$ pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

(2) Boilers EUD-2 and EUD-3, rated at 150,000 Btu per hour each, both constructed in 2000, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boilers shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 = 0.45 MMBtu/hr

Pt = $1.09 / (0.45)^{0.26} = 1.34$ pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

(3) Boiler EUD-5, rated at 150,000 Btu per hour each, constructed in 2003, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983.

Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 + 0.15 = 0.60 MMBtu/hr

Pt = $1.09 / (0.60)^{0.26}$ = 1.24 pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

(4) Boiler EUD-6, rated at 150,000 Btu per hour, constructed in 2004, is subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 + 0.15 + 0.15 = 0.75 MMBtu/hr

Pt = $1.09 / (0.75)^{0.26}$ = 1.17 pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

(5) Boilers EUD-7A and EUD-7B, rated at 150,000 Btu per hour each, both constructed in 2005, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input = 0.15 + 0.30 + 0.15 + 0.15 + 0.30 = 1.05 MMBtu/hr

Pt = $1.09 / (1.05)^{0.26}$ = 1.07 pounds per MMBtu

Pursuant to the rule, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the allowable emissions should be less than 0.6 lb/MMBtu.

Each boiler was able to comply with this limit. (See PM emissions of combustion units on Page 4 of Appendix A)

Woodworking Operation

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from woodworking operations shall not exceed the following:

Location	ID	Weight Rate (lb/hr)	Weight Rate (ton/hr)	PM Limitation (lb/hr)	Uncontrolled PM (lb/hr)*	Controlled PM (lb/hr)*
Plant 1	EUA-1	10,000	5	12.05	7020.0	7.0
Plant 2	EUA-2	3,000	1.5	5.38	14.1	2.8
Plant 5	EUA-5	7,800	3.9	10.20	2808.0	2.8
Plant 6	EUA-6	2,800	1.4	5.14	187.4	2.8
Plant 7A	EUA-7A	4,900	2.45	7.47	187.3	2.8
Plant 7B	EUB-7B	6,300	3.15	8.84	187.3	2.8
Plant 19	EUB-19	4,200	2.1	6.74	187.3	2.8

* See calculation on Page 2 of Appendix A.

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

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

The baghouses and cyclone are required to operate to comply with these allowable emissions.

Coating/repairing Assembly and Laminate Operations:

(c) 326 IAC 8-2-9 (Miscellaneous Metal 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.

The source only coats metal in Plant 4, but the potential to emit VOC from coating metal part, in this Plant 4, is less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

(d) 326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)
The requirements of 326 IAC 8-2-12 are not applicable to this source, since this source does not perform surface coating of wood furniture or cabinets. All wood furniture and wood furniture components installed in the travel trailers are shipped to the source pre-manufactured and pre-coated. Surface coating of wood at this source consists of surface coating of structural wood with adhesives, which is not subject to this rule. (See the 326 IAC 8-1-6 requirements for assembly operation for the structural wood with adhesives.)

(e) 326 IAC 8-1-6 (New facilities; general reduction requirements)
(1) The unlimited VOC potential emissions from the assembly operation; caulking, sealing, gluing, etc., of wood and plastic, in Plant 5 is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from this plant to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

This is a new requirement for this source, since the maximum capacity of this source has increase resulting in the VOC greater than 25 tons per year.

(2) The unlimited VOC potential emissions from the assembly operations from all other Plants are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

(3) The unlimited VOC potential emissions from the lamination operation, from flow coating laminator, identified as EUL-7A, are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Welding Operation

(f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the four (4) welding stations are exempt from the requirements of 326 IAC 6-3-2 because they each consume less than six hundred twenty-five (625) pounds of rod or wire per day.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6.1 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 2-6.1. 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 determination for wood working is required for the source, the baghouse or cyclone for particulate control shall be in operation and control emissions at all times when the woodworking is in operation.

The compliance monitoring requirements; a visible emission notation and a pressure drop reading, are not required for woodworking for this source, since the emissions from the baghouse and cyclone are venting through the general ventilation.

The testing is not required for this source during this renewal.

Recommendation

The staff recommends to the Commissioner that the MSOP 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 September 22, 2011. Additional information was received on September 9, October 12 and 27, 2011.

Conclusion

The operation of this manufacturing recreational vehicles, which includes travel trailers, fifth wheels and campers source shall be subject to the conditions of the attached MSOP Renewal No. 087-30957-00063.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon 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) (234-5615) or toll free at 1-800-451-6027 extension 4-5615.

(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: Emission Summary

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

Uncontrolled Potential Emissions (tons/year)										
Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**Nox**	**CO2e**	**Single HAP**	**Combined HAPs**
Woodworking Operation	92.35	92.35	92.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Welding Stations	0.15	0.15	0.15	0.00	0.00	0.00	0.00	0.00	1.12	1.12
Assembly Operation	0.00	0.00	0.00	0.00	72.64	0.00	0.00	0.00	8.74	10.69
Lamination	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.97	2.98
Painting	0.20	0.20	0.20	0.00	0.96	0.00	0.00	0.00	0.07	0.07
Combustion	0.04	0.15	0.15	0.01	0.11	1.68	2.00	2432.47	0.04	0.04
Total	**92.74**	**92.85**	**92.85**	**0.01**	**73.71**	**1.68**	**2.00**	**2432.47**	**8.74**	**14.89**

Appendix A: Woodworking Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

					Controlled Potential Emissions		Uncontrolled Potential Emissions	
Plant Name	**Outlet Grain Loading**	**Air Flow Rate**	**Dust Collector Type**	**Control Efficiency**	**PM Emissions lbs/hr**	**PM Emissions tons/year**	**PM Emissions lbs/hr**	**PM Emissions tons/year**
Plant 1	0.105	7800	Baghouse	99.9%	7.0	30.7	7020.0	30747.6
Plant 2	0.121	2725	Cyclone	80.0%	2.8	12.4	14.1	61.9
Plant 5	0.042	7800	Baghouse	99.9%	2.8	12.3	2808.0	12299.0
Plant 6	0.066	4968	Baghouse	98.5%	2.8	12.3	187.4	820.7
Plant 7A & 7B	0.083	3950	Baghouse	98.5%	2.8	12.3	187.3	820.6
Plant 19	0.083	3950	Baghouse	98.5%	2.8	12.3	187.3	820.6
					Total	**92.35**	**10404.2**	**45570.31**

Methodology

Note: The above calculation is from the permit 087-27076-00063 issued on January 12, 2007, except for the emissions from Plant 4, which was removed since this unit was no longer in operation.

Also, PTE of Plant 19 is assumed to have the same grain loading and air flow rate as the unit 7A since it has similar capacity.

Controlled PTE PM emissions (lb/hr) = (outlet grain loading gr/dscf) x (air flow dscf/min) x (60 min/hr) / (7000 gr/lb)
Controlled PTE PM emissions (tons/yr) = (PTE controlled emissions lb/hr) * (8760 hr/yr)/(2000 lb/ton)

Uncontrolled PTE PM emissions (lb/hr) = (PTE Controlled emission rate lb/hr)/(1- control efficiency)
Uncontrolled PTE PM emissions (ton/yr) = PTE controlled emission rate lb/hr) x (8760 hr/yr) / (2000 lb/ton)

Appendix A: Welding Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

Welding	Max Electrode Consumption (Pounds/yr)	Emission Factor (lb/10 cubed lb wire consumed)			Emissions (tons/yr)		
		PM10	Cr	Mn	PM10	Cr	Mn
Welding (EUC-2)	3504	0.0024	0.000001	0.00002	0.04	0.016	0.28
Welding (EUC-7A)	3504	0.0024	0.000001	0.00002	0.04	0.016	0.28
Welding (EUC-7B)	3504	0.0024	0.000001	0.00002	0.04	0.016	0.28
Welding (EUC-7C)	3504	0.0024	0.000001	0.00002	0.04	0.016	0.28
				Total	0.15	0.064	1.12

Note:

Emission Factors for MIG welding are based on AP-42 Emission Factors, Chapter 12.19

Emissions (tons/year) = Max Electrode Consumption (lbs/year) * Emission Factor(lb/1$0^3$ lb) * 8760 hours * (1ton/2000 lbs)

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: **KZ-RV, Inc**
Address City IN Zip: **9270 West US 20**
MSOP: **M 087-30957-00063**
Reviewer: **Renee Traivaranon**
Date: **October 7, 2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
4.6	1000	40.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.04	0.2	0.2	0.01	2.0	0.1	1.7

*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 next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
HAPs Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewer: Renee Traivaranon
Date: October 7, 2011

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.231E-05	2.418E-05	1.511E-03	3.627E-02	6.850E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.007E-05	2.216E-05	2.821E-05	7.656E-06	4.231E-05

Methodology is the same as previous page.

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 next Page for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Greenhouse Gas Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewer: Renee Traivaranon
Date: October 7, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,418	0.0	0.0
Summed Potential Emissions in tons/yr	2,418		
CO2e Total in tons/yr	2,432		

Methodology
The N2O Emission Factor for uncontrolled is 2.2.
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).

Appendix A: Assembly Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

Plant Name	Maximum Production Rate (units/hr)	VOC Emissions TPY
Plant 5	3	35.27
Plant 6	0.75	8.82
Plant 7B	1.13	13.28
Plant 19	0.75	8.82
Plant 7A	0.88	6.45
Total	**5.63**	**72.64**

Vendor	Product Code	Product Name	Material Used On	Density	Usage (lbs/hr)	VOC content	Toluene	Glycol Ether	VOC emissions	Toluene Emissions	Glycol Ether Emissions
				lbs/gal	lbs/hr	lbs/gal	wt %	wt %	lbs/hr	lbs/hr	lbs/hr
BBC	300210	MHRV 2300 clear caulk	wood and plastic	7.99	3.35	2.60	0.00%	0.00%	1.09	0.00	0.00
BBC	IP300106	Acrylic White Caulk	wood and plastic	13.62	3.50	2.72	0.00%	0.00%	0.70	0.00	0.00
Boring Smith	DC12880	General Purpose Adhesive	wood and plastic	6.83	3.06	2.38	0.00%	0.00%	1.07	0.00	0.00
Cast Products	887790	Pipe Thread Sealent	wood and plastic	11.76	3.82	2.97	0.00%	15.00%	0.97	0.00	0.45
LaVanture	T614B	Lavasil silicone sealent	wood and plastic	8.61	0.55	0.43	0.00%	0.00%	0.03	0.00	0.00
Alpha	N308000P	Water based adhesive	wood and plastic	8.35	0.22	0.17	2.00%	0.00%	0.00	0.00	0.00
BBC	300061	White Glue	wood and plastic	9.44	0.11	0.09	0.00%	0.00%	0.00	0.00	0.00
BBC	300103	Black Caulk	wood and plastic	8.43	0.33	0.26	0.00%	0.00%	0.01	0.00	0.00
Boring Smith	BSI2001M-29	High Temp Adhesive	wood and plastic	6.67	5.58	4.34	13.00%	0.00%	3.63	0.73	0.00
Alpha	N101001	Non Sag white Caulk	wood and plastic	9.59	3.95	3.07	32.00%	0.00%	1.27	1.26	0.00
Alpha	N102101	Low VOC white caulk	wood and plastic	11.18	2.88	2.24	0.00%	0.00%	0.58	0.00	0.00
Alpha	N801100P	Water Based adhesive	wood and plastic	9.76	0.03	0.02	0.00%	0.00%	0.00	0.00	0.00
LaSalle	7530902	ABS cement black	wood and plastic	7.17	7.30	5.67	0.00%	0.00%	5.77	0.00	0.00
Forbo	9053	Adhesive	wood	12.02	0.12	0.09	0.00%	0.00%	0.001	0.00	0.00
											0.00
									15.11	1.99	0.45
									66.19	8.74	1.95
										HAPs Total	**10.69**

METHODOLOGY

Above data were provide by the source, except unit 7A
The VOC PTE of unit 7A is from 087-27076-00063
Plant 4 assembly operation emissions have been removed in this renewal since the company currently uses this plant 4 for lamination and repair operation, see Page 8 and 9 calculation for current the operation.

Potential to Emit VOC (tons/yr) =[VOC content of matterial(lb/gal) * Material Usage (lbs/hr)/Coating density (lbs/gal)] * 8760 hr/yr * 1 ton/2000 lbs
PTE HAPS emission rate (tons/yr) = Usage (lb/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Lamination Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

Plant 4-Laminator

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Weight % Volatile (H20 & 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	Forbo	Swift lok 9053	Adhesive	Side Wall Lamination Adhesive	10.01	0.00E+00	0.00%	0.00%	0.00%	95.00%	1.1289	3.000	0.00	0.00	0.00E+00	0.00E+00	0.00E+00	0.00	0.00	100%	Plastic/Wood
*Lamination	Benzoflex	352	Cleaner	Lamination Equipment Cleaning	11.23	0.00E+00	0.00%	0.00%	0.00%	100.00%	0.0002	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Plastic/Wood
Potential to Emit															**0.00E+00**	**0.00E+00**	**0.00E+00**	**0.00**			

*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	Forbo	Swift lok 9053	Adhesive	Side Wall Lamination Adhesive	10.01	1.13E+00	3.000	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	2.97	0.00	0.00	0.00	0.00	2.97
*Lamination	Benzoflex	352	Cleaner	Lamination Equipment Cleaning	11.23	2.49E-04	3.000	0.00%	0.00%	0.00%	0.00%	17.00%	0.00%	0.00	0.00	0.00	0.00	0.01	0.00	0.01
Potential to Emit														**0.00**	**2.97**	**0.00**	**0.00**	**0.01**	**0.00**	**2.98**

***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)

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: Paint Repair Emissions

Company Name: KZ-RV, Inc
Address City IN Zip: 9270 West US 20
MSOP: M 087-30957-00063
Reviewed by: Renee Traivaranon
Date: October 7, 2011

Plant 4 -Repairing Operation

Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % 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
Paint Repair	US Chemicals	58020	Resin hardener	9.59	35.00%	0.0%	35.0%	0.00%	54.40%	0.3750	0.018	3.36	3.36	8.00	0.54	0.10	0.05	6.17	75%	Metal
Paint Repair	SEM	39542	Carbo Fill	12.48	0.00%	0.0%	0.0%	0.00%	100.00%	0.2500	0.018	0.00	0.00	0.00	0.00	0.00	0.06	0.00	75%	Metal
Paint Repair	Evercoat	100636	Slick sand	10.86	19.34%	0.0%	19.3%	0.00%	71.46%	0.2500	0.018	2.10	2.10	0.01	0.23	0.04	0.04	2.94	75%	Metal
Paint Repair	SEM	39492	Panel Filler	13.86	0.00%	0.0%	0.0%	0.00%	100.00%	0.1252	0.018	0.00	0.00	0.00	0.00	0.00	0.03	0.00	75%	Metal
Paint Repair	BASF	D403ZZ	Basecoat	7.51	75.00%	0.0%	75.0%	0.00%	23.47%	0.2500	0.018	5.63	5.63	0.03	0.61	0.11	0.01	1.84	75%	Metal
Paint Repair	BASF	UR30	Reducer	6.93	100.00%	0.0%	100.0%	0.00%	5.84%	0.0250	0.018	6.93	6.93	0.00	0.07	0.01	0.00	1.23	75%	Metal
Paint Repair	BASF	DC5135	Clear	8.51	68.20%	0.0%	68.2%	0.00%	21.14%	0.1250	0.018	5.80	5.80	0.01	0.31	0.06	0.01	3.25	75%	Metal
Paint Repair	BASF	UBR200	Spot blender	7.59	99.00%	0.0%	99.0%	0.00%	-2.09%	0.1250	0.018	7.51	7.51	0.02	0.41	0.07	0.00	6.01	75%	Metal
Paint Repair	3M	6086	buffing compound	8.76	84.00%	0.0%	84.0%	8.00%	0.02%	0.1250	0.018	8.00	7.36	0.02	0.40	0.07	0.00	5.42	75%	Metal
Paint Repair	Danco	NA	De-Solv	6.29	100.00%	0.0%	100.0%	0.00%	14.54%	1.0000	0.018	6.29	6.29	0.11	2.72	0.50	0.00	3.84	75%	Metal
												0.00	0.00	0.00	0.00	0.00	0.00	2.35	75%	Metal
Potential to Emit														**8.20**	**5.29**	**0.96**	**0.20**			

Transfer Efficiency - Hand or Manual Application = 100%, Aerosol = 50%, HVLP = 75%

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)
PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (tons/yr) = (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

HAZARDOUS AIR POLLUTANTS

Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % MIBK	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Paint Repair	US Chemicals	58020	Resin hardener	9.59	0.375	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	SEM	39542	Carbo Fill	12.48	0.25	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	Evercoat	100636	Slick sand	10.86	0.25	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	SEM	39492	Panel Filler	13.86	0.1252	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	BASF	D403ZZ	Basecoat	7.51	0.25	0.018	0.00%	10.00%	0.00%	0.00%	15.00%	0.00	0.01	0.00	0.00	0.02	0.04
Paint Repair	BASF	UR30	Reducer	6.93	0.025	0.018	0.00%	0.00%	0.00%	15.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	BASF	DC5135	Clear	8.51	0.125	0.018	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.19E-03	0.00	0.00	0.01
Paint Repair	BASF	UBR200	Spot blender	7.59	0.125	0.018	5.00%	0.00%	0.00%	0.00%	20.00%	3.74E-03	0.00	0.00	0.00	0.01	0.02
Paint Repair	3M	6086	buffing compound	8.76	0.125	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Paint Repair	Danco	NA	De-Solv	6.29	1	0.018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Potential to Emit												**3.74E-03**	**1.48E-02**	**4.19E-03**	**2.05E-03**	**0.04**	**0.07**

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

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: Dean Gillette
K-Z, Inc.
9270 W US 20
Shipshewana, IN 46565

DATE: December 30, 2011

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

SUBJECT: Final Decision
MSOP
087-30957-00063

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:
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

December 30, 2011

TO: Shipshewana Public Library

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

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

Applicant Name: K-Z, Inc.
Permit Number: 087-30957-00063

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	CDENNY 12/30/2011 K-Z, Inc. 087-30957-00063 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Dean Gillette K-Z, Inc. 9270 W US 20 Shipshewana IN 46565 (Source CAATS)									
2		Delbert Miller Corporate VP K-Z, Inc. 9270 W US 20 Shipshewana IN 46565 *(RO CAATS)*									
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 *(Health Department)*									
5		LaGrange Town Council 1201 N Townline Road LaGrange IN 46761 *(Local Official)*									
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 *(Local Official)*									
7		Shipshewana Public Library 315 Morton Street Shipshewana IN 46565 *(Library)*									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
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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