INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
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: January 14, 2013

RE: Champion Home Builders, Inc. / 087-32005-00083

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

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
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New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Champion Home Builders, Inc.
1500 N Detroit Street
LaGrange, Indiana 46765

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No. F087-32005-00083	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 14, 2013 Expiration Date: January 14, 2018

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary mobile home manufacturing source.

Source Address:	1500 N Detroit Street, LaGrange, Indiana 46765
General Source Phone Number:	(260) 593-2962
SIC Code:	2451 (Mobile Homes)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Plant D, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Thirteen (13) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(b) Plant E, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Fourteen (14) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(c) Plant F, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Sixteen (16) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting into the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

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

This stationary source also includes the following insignificant activities:

(a) Other activities and categories with PM/PM10/PM2.5 emissions below the insignificant thresholds of five (5) pounds per hour, or twenty-five (25) pounds per day, including: cutting, drilling, grinding, machining, routing, sanding, and/or sawing of wood and other construction materials using hand tools. [326 IAC 6-3-2(e)(2)]]

(b) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs, including brazing equipment, cutting torches, soldering equipment and welding equipment, with a combined (Plants D, E, and F) maximum welding consumables usage of less than 100 pounds per hour. [326 IAC 6-3-2(e)(2)]]

(c) Other activities and categories with negligible potential uncontrolled HAP emissions, consisting of four (4) adhesive application systems. 4,4'-methlenediphenyl diisocyanate (MDI), an ingredient in the adhesive and HAP, reacts (polymerizes) to produce polyurethane polymers, such as foams and adhesives (i.e. F2100A ITW Foamseal). Completely cured products are fully reacted and are therefore considered inert and non-toxic. Potential MDI emissions from this activity are estimated to be 1.76×10^{-4} pounds per hour, or 1.545 pounds per year, based on 8,760 hours per year of operations.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:

(1) Plant D direct-fired heaters, including the following:

(A) Two (2) heaters, identified as Heaters 1 and 2, constructed in 1994, having a maximum heat input capacity of 0.2 million British thermal units per hour (MMBtu/hr), each, uncontrolled and exhausting through stacks SVH1 and SVH2 respectively;

(B) Two (2) heaters, identified as Heaters 3 and 4, constructed in 1994, having a maximum heat input capacity of 0.4 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH3 and SVH4 respectively; and

(C) Four (4) heaters, identified as Heaters 5 through 8, approved for construction in 2012, having a maximum heat input capacity of 0.1 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH5 through SVH8, respectively.

(2) Plant E direct-fired heaters, including the following:

(A) One (1) heater, identified as Heater 9, approved for construction in 2012, having a maximum heat input capacity of 0.4 MMBtu/hr, uncontrolled and exhausting through stack SVH9;

(B) Two (2) heaters, identified as Heaters 10 and 11, approved for construction in 2012, having a maximum heat input capacity of 0.8 MMBtu/hr, each, uncontrolled and exhausting through stack SVH10 and SVH11 respectively; and

(C) One (1) heater, identified as Heater 12, approved for construction in 2012, having a maximum heat input capacity of 0.125 MMBtu/hr, uncontrolled and exhausting through stack SVH12.

(3) Plant F direct-fired heaters, including the following:

(A) Five (5) heaters, identified as Heaters 13 through 17, approved for construction in 2012, having a maximum heat input capacity of 0.4 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH13 through SVH17 respectively; and

(B) Two (2) heaters, identified as Heaters 18 and 19, approved for construction in 2012, having a maximum heat input capacity of 0.125 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH18 and SVH19 respectively.

(e) Equipment powered by internal combustion engines with capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including plant fork lift trucks.

(f) A petroleum fuel [other than gasoline] dispensing facility having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(h) VOC and HAP storage containers/vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Air compressors and pneumatically operated equipment, including hand tools.

(j) Closed loop heating and cooling systems.

(k) Heat exchanger cleaning and repair.

(l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

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

A.4 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, F087-32005-00083, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

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

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

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

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

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

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

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

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

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

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

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F087-32005-00083 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

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

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolitions start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

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

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

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) Records of all required monitoring data, reports, and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application.

(1) Support information includes the following:

(A) All calibration and maintenance records.

(B) All original strip chart recordings for continuous monitoring instrumentation.

(C) Copies of all reports required by the FESOP.

(2) Records of required monitoring information include the following:

(A) The date, place, as defined in this permit, and time of sampling or measurements.

(B) The dates analyses were performed.

(C) The company or entity that performed the analyses.

(D) The analytical techniques or methods used.

(E) The results of such analyses.

(F) The operating conditions as existing at the time of sampling or measurement.

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

(b) The address for report submittal is:

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

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating

(a) Plant D, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Thirteen (13) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(b) Plant E, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Fourteen (14) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(c) Plant F, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Sixteen (16) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting into the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, and in order to render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, the Permittee shall comply with the following:

(a) The total VOC input to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 98.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(b) The total input of any single HAP to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains,

paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(c) The total input of combined HAPs to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOCs and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) Limit [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

The total VOC input to Plants D, E, and F, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, and excluding VOC input to the wood furniture/cabinet coating activities which are regulated under 326 IAC 8-2-12 in Condition D.1.3, shall not exceed 24.9 tons of VOC per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from Plants D, E, and F, each, to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), surface coatings applied to wood furniture and cabinets at each of Plants D, E, and F, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one (1) or more of the following application systems:

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP limitations contained in Conditions D.1.1(a), D.1.1(b), D.1.1(c), and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, except where noted, and shall be complete and sufficient to establish compliance with the requirements contained in Conditions D.1.1, D.1.2, and D.1.3.

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

(2) The amount of each coating material and solvent used;

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

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

(3) The cleanup solvent usage for each month;

(4) The method(s) of application for the wood furniture and cabinets coatings, including touch-up coatings, at each of Plants D, E, & F;

(5) The total VOC and HAP (worst-case single and combined) input to each of Plants D, E, & F for each month;

(6) The total VOC and HAP (worst-case single and combined) input to each of Plants D, E, & F for each compliance period.

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

D.1.6 Reporting Requirements

Quarterly summaries of the information to document compliance status with Conditions D.1.1 and D.1.2, shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

(a) Plant D, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(b) Plant E, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(c) Plant F, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(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 2-8-4(1)]

D.2.1 PSD Minor Limit: PM, PM10, and PM2.5 [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) PM emissions from the Plants D, E, and F mill shop baghouses shall not exceed 16.48 pounds per hour, each.

(b) PM10 emissions from the Plants D, E, and F mill shop baghouses shall not exceed 7.32 pounds per hour, each; and

(c) PM2.5 emissions from the Plants D, E, and F mill shop baghouses shall not exceed 7.32 pounds per hour, each.

Compliance with this limit, 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 to less than 250 tons per 12 consecutive month period, the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the Plant D, E, and F mill shops shall not exceed the corresponding pound per hour limitations listed in the table below:

Emission Unit/Activity	Process Weight Rate (tons/hr)	PM Emission Rate (lbs/hr)
Plant D Mill Shop	5.13	12.27
Plant E Mill Shop	5.13	12.27
Plant F Mill Shop	5.13	12.27

These limitations are based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds *(or 30 tons)* per hour shall be accomplished by use of the equation:

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.4 Particulate Control (PM/PM10/PM2.5)

(a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for particulate control of Plants D, E, and F mill shops shall be in operation and control emissions from the mill shops woodworking equipment at all times that the corresponding mill shops woodworking equipment is in operation.

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

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

D.2.5 Visible Emission Notations

(a) Visible emission notations of each of the Plants D, E, and F mill shops baghouse stack exhausts shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Broken or Failed Bag Detection

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

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

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

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of visible emission notations of each of the Plants D, E, and F mill shops baghouse stack exhausts once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g., the process did not operate that day).

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(a) Other activities and categories with PM/PM10/PM2.5 emissions below the insignificant thresholds of five (5) pounds per hour, or twenty-five (25) pounds per day, including: Cutting, drilling, grinding, machining, routing, sanding, and/or sawing of wood and other construction materials using hand tools. [326 IAC 6-3-2(e)(2)]]

(b) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs, including brazing equipment, cutting torches, soldering equipment and welding equipment, with a combined (Plants D, E, and F) maximum welding consumables usage of less than 100 pounds per hour. [326 IAC 6-3-2(e)(2)]]

(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 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter emissions rate from any process which has a maximum process weight rate of less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following insignificant activities located in Plants D, E, & F:

(a) Equipment related to manufacturing activities resulting in negligible emissions of Haps including: brazing equipment, cutting torches, soldering equipment, and welding equipment, where the total use of welding consumables is less than 100 pounds per hour, combined.

(b) Trimming of less than 100 pounds per hour of wood and other construction materials using hand tools.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Champion Home Builders, Inc.
Source Address: 1500 N Detroit Street, LaGrange, Indiana 46765
FESOP Permit No.: F087-32005-00083

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Champion Home Builders, Inc.
Source Address: 1500 N Detroit Street, LaGrange, Indiana 46765
FESOP Permit No.: F087-32005-00083

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Champion Home Builders, Inc.
Source Address: 1500 N Detroit Street, LaGrange, Indiana 46765
FESOP Permit No.: F087-32005-00083
Facility: Plants D, E, & F (combined)
Parameter: Total combined VOC input, and single and combined HAPs input
Limit:

(a) The total VOC input to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 98.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(b) The total input of any single HAP to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 9.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and

(c) The total input of any combined HAPs to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ **Year:** _____

Month	Total Input This Month (tons)			Total Input Previous 11 Months (tons)			12 Month Total Input (tons)		
	VOC	Single HAP	Combined HAPs	VOC	Single HAP	Combined HAP	VOC	Single HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Champion Home Builders, Inc.
Source Address: 1500 N Detroit Street, LaGrange, Indiana 46765
FESOP Permit No.: F087-32005-00083
Facility: Plants D, E, & F (each)
Parameter: Total VOC input to each of the Plants D, E, and F
Limit: The total VOC input to Plants D, E, and F, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, and excluding VOC input to the wood furniture/cabinet coating activities which are regulated under 326 IAC 8-2-12 in Condition D.1.3, shall not exceed 24.9 tons of VOC per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

Quarter: _____ **Year:** _____

Month	VOC Input This Month (tons)			VOC Input Past 11 Months (tons)			12 Month Total VOC Input (tons)		
	Plant:			Plant:			Plant:		
	D	E	F	D	E	F	D	E	F
Month 1									
Month 2									
Month 3									

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on_____

Submitted by: _____

Title / Position: _____

Signature:_____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Champion Home Builders, Inc.
Source Address: 1500 N Detroit Street, LaGrange, Indiana 46765
FESOP Permit No.: F087-32005-00083

Months: _____ to _____ Year: _____

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Champion Home Builders, Inc.
1500 N Detroit Street
LaGrange, Indiana 46765

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Champion Home Builders, Inc. 1500 N Detroit Street, LaGrange, Indiana 46765, completed construction of the mobile home manufacturing source on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 12, 2012, and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F087-32005-00083, Plant ID No. 087-00083 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: Champion Home Builders, Inc.
Source Location: 1500 N Detroit Street, Lagrange, IN 46765
County: LaGrange
SIC Code: 2451 (Mobile Homes)
Operation Permit No.: F087-32005-00083
Permit Reviewer: Hannah L. Desrosiers

On June 12, 2012, the Office of Air Quality (OAQ) received an application from Champion Home Builders, Inc. related to the construction and operation of a new stationary mobile home manufacturing source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaGrange County. The following attainment status designations are applicable to LaGrange County:

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005.
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.	

(Air Pollution Control Board; 326 IAC 1-4-45; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$

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. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Champion Home Builders, Inc. on June 12, 2012, relating to the construction and operation of a new stationary mobile home manufacturing source.

This new source will consist of three (3) separate production buildings, identified as Plant D, Plant E, and Plant F, and will include the following emission units and pollution control devices:

(a) Plant D, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Thirteen (13) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(b) Plant E, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Fourteen (14) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting inside the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system

with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(c) Plant F, approved for construction in 2012, producing up to two (2) mobile home modular units per hour, and consisting of:

(1) Sixteen (16) product assembly workstations, using hand (wipe), roll, bead, and brush application of miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly, uncontrolled and exhausting into the building.

(2) One (1) wallboard coating area, using airless spray to apply gypsum-based ceiling texture to wallboard, uncontrolled and exhausting inside the building.

(3) One (1) mill room, consisting of woodworking equipment including radial arm saws and table saws for shaping and sizing wood materials, processing a maximum of 10,265 pounds of wood per hour, with particulate matter controlled by a vacuum collection system with fabric filter dust collector, and exhausting through a closed return air system, which has the capability to vent outside the building without a stack.

(d) Insignificant activities consisting of the following:

(1) Other activities and categories with $PM/PM_{10}/PM_{2.5}$ emissions below the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: cutting, drilling, grinding, machining, routing, sanding, and/or sawing of wood and other construction materials using hand tools. [326 IAC 6-3-2(e)(2)]]

(2) The following equipment, related to manufacturing activities not resulting in the emission of HAPs, including brazing equipment, cutting torches, soldering equipment and welding equipment, with a combined (Plants D, E, and F) maximum welding consumables usage of less than 100 pounds per hour. [326 IAC 6-3-2(e)(2)]]

(3) Other activities and categories with negligible potential uncontrolled HAP emissions, consisting of four (4) adhesive application systems. 4,4'-methlenediphenyl diisocyanate (MDI), an ingredient in the adhesive and HAP, reacts (polymerizes) to produce polyurethane polymers, such as foams and adhesives (i.e. F2100A ITW Foamseal). Completely cured products are fully reacted and are therefore considered inert and non-toxic. Potential MDI emissions from this activity are estimated to be 1.7×10^{-4} pounds per hour, or 1.532 pounds per year, based on 8,760 hours per year of operations.

(4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:

(A) Plant D direct-fired heaters, including the following:

(i) Two (2) heaters, identified as Heaters 1 and 2, approved for construction in 2012, having a maximum heat input capacity of 0.2 million British thermal units per hour (MMBtu/hr), each, uncontrolled and exhausting through stacks SVH1 and SVH2 respectively;

(ii) Two (2) heaters, identified as Heaters 3 and 4, approved for construction in 2012, having a maximum heat input capacity of 0.4 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH3 and SVH4 respectively; and

(iii) Four (4) heaters, identified as Heaters 5 through 8, approved for construction in 2012, having a maximum heat input capacity of 0.1

MMBtu/hr, each, uncontrolled and exhausting through stacks SVH5 through SVH8, respectively.

(B) Plant E direct-fired heaters, including the following:

(i) One (1) heater, identified as Heater 9, approved for construction in 2012, having a maximum heat input capacity of 0.4 MMBtu/hr, uncontrolled and exhausting through stack SVH9;

(ii) Two (2) heaters, identified as Heaters 10 and 11, approved for construction in 2012, having a maximum heat input capacity of 0.8 MMBtu/hr, each, uncontrolled and exhausting through stack SVH10 and SVH11 respectively; and

(iii) One (1) heater, identified as Heater 12, approved for construction in 2012, having a maximum heat input capacity of 0.125 MMBtu/hr, uncontrolled and exhausting through stack SVH12.

(C) Plant F direct-fired heaters, including the following:

(i) Five (5) heaters, identified as Heaters 13 through 17, approved for construction in 2012, having a maximum heat input capacity of 0.4 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH13 through SVH17 respectively; and

(ii) Two (2) heaters, identified as Heaters 18 and 19, approved for construction in 2012, having a maximum heat input capacity of 0.125 MMBtu/hr, each, uncontrolled and exhausting through stacks SVH18 and SVH19 respectively.

(5) Equipment powered by internal combustion engines with capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including plant fork lift trucks.

(6) A petroleum fuel [other than a gasoline] dispensing facility having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

(7) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(8) VOC and HAP storage containers/vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(9) Air compressors and pneumatically operated equipment, including hand tools.

(10) Closed loop heating and cooling systems.

(11) Heat exchanger cleaning and repair.

(12) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(13) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

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

Unpermitted Emission Units and Pollution Control Equipment

No unpermitted emission units were discovered operating at this existing source during this review process.

"Integral Part of the Process" Determination

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 for determining operating permit level purposes. However, this integral determination does not negate the requirement for a limit to comply with 326 IAC 2-2 (Prevention of Significant Deterioration).

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations. Additionally, the following applies:

(a) The data for the surface coating materials used in the manufacture of the mobile home modular units are taken from MSDSs supplied by the source, and from the Historic MSDSs on file in IDEM's Virtual File Cabinet (VFC) for Permit No. F087-23808-00045.

(b) All of the coatings used in the manufacture of the mobile home modular units are applied using a handheld caulking gun, or using roll or brush application methods; therefore, it is assumed that the transfer efficiency is 100% and no particulate overspray emissions are generated. All cleaners/solvents are applied via handwipe.

(c) The adhesive products F2100A ITW Foamseal and Pemco Adhesive are polymerizing adhesives that contain methylene bis(phenyl isocyante) (MDI) and polymeric MDI (PMDI). Only trace amounts of MDI flash-off during product reaction. PMDI completely polymerizes into the product and is not emitted. For Foamsean F2100, the material is 50% MDI and 50% PMDI. Computations of the MDI flash-off emissions were provided by the source and determined using "MDI Emissions Reporting Guidelines", published by The Society of the Plastics Industry, as 5e-07 lb MDI per lb-F2100A Foamsel used. Based on a maximum material usage rate of 34.11 gal/hr, this produces a VOC and MDI emission rate of 7.7×10^{-04} tons per year.

(d) According to the MSDS submitted by the source, the gypsum-based ceiling texture used in the wallboard coating area is VOC and HAP free. The inert material is mixed with water and then applied using airless spray. The consistency of the mixture is such that particulate emissions are assumed negligible.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls, and after the integral woodworking controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM[(1)]	801.18 (before integral control) 42.27 (after integral control)
PM10[(1)(2)]	801.33 (before integral control) 42.42 (after integral control)
PM2.5[(1)]	801.33 (before integral control) 42.42 (after integral control)
SO_2	0.02
NO_x	2.62
VOC	1,820.68
CO	2.20
GHGs as CO_2e	3,159.57
Total HAPs	48.18
Worst Single HAP	18.02 (toluene)

(1) The Plant D, Plant E, and Plant F mill room woodworking equipment is controlled by vacuum collection systems equipped with fabric filter dust collectors. This control equipment is considered "integral to process"; therefore, the potential to emit after controls has been used in determining the permitting level (see the “Integral Part of the Process” Determination Section of the TSD for further explanation).

(2) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) VOCs is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants (after integral woodworking controls) are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of total combined HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Surface Coating (1)	0.00	0.00	0.00	0	0	98.8	0	0	24.5	9.5 (any single HAP)
Woodworking (2)	216.55	96.32	96.32	0	0	0	0	0	0	NA
MIG Welding	2.28	2.28	2.28	0	0	0	0	0	0.14	0.14 (manganese)
Natural Gas Combustion	0.05	0.20	0.20	0.02	2.62	0.14	2.20	3,159.57	0.050	0.050 (hexane)
Total PTE of Entire Source	**216.87**	**98.79**	**98.79**	**0.02**	**2.62**	**98.94**	**2.20**	**3,159.57**	**24.69**	**9.5 (any single HAP)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

NA = not applicable
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
(1) Limited PTE based upon VOC and HAP input limits to comply with 326 IAC 2-8 (FESOP), and to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.
(2) Limited PTE PM, PM10, and PM2.5 based on a pound per hour (lb/hr) limit to render 326 IAC 2-2 (PSD) not applicable.

(a) FESOP and PSD Minor Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM10, and PM2.5 is limited to less than 250 tons per year, each, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

(1) PM emissions from the Plants D, E, and F mill shop baghouses shall not exceed 16.48 pounds per hour, each;

Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 72.90%, as demonstrated in TSD Appendix A.

(2) PM10 emissions from the Plants D, E, and F mill shop baghouses shall not exceed 7.32 pounds per hour, each; and

Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 87.95%, as demonstrated in TSD Appendix A.

(3) PM2.5 emissions from the Plants D, E, and F mill shop baghouses shall not exceed 7.32 pounds per hour, each.

Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 87.95%, as demonstrated in TSD Appendix A.

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 to less than 250 tons per 12 consecutive month period, PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Note: The Plants D, E, and F mill shop baghouses have been determined integral to the process, therefore, the baghouses shall be in operation and control emissions from the Plants D, E, and F mill shop woodworking at all times that the corresponding Plants D, E, and F mill shop woodworking is in operation.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) The total VOC input to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 98.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(2) The total input of any single HAP to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(3) The total input of combined HAPs to Plants D, E, and F, combined, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) 40 CFR 60, Subpart Dc - Standards for Small Industrial/Commercial/Institutional Steam Generating Units
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 included in the permit for the nineteen (19) natural gas-fired, direct-fired heaters, since they each have a maximum design heat input capacity of less than ten (10) MMBtu per hour and they are each not a steam generating unit as defined in 40 CFR 60.41c.

(b) 40 CFR 60, Subpart Kb - Standards for Volatile Organic Liquid Storage Vessels

(1) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit for the petroleum fuel [other than gasoline] dispensing facility, because although the tank will be constructed in 2012, after the rule applicability date of July 23, 1984, the tank has a maximum storage capacity of less than seventy-five cubic meters (75 m3) (19,813 gallons), and the liquid stored in the tank has a maximum true vapor pressure of less than fifteen kiloPascals (15.0 kPa).

(2) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit for the VOC and HAP storage containers/vessels for storing lubricating oils, hydraulic oils, machining oils, and machining fluids, because although each tank will be constructed in 2012, after the rule applicability date of July 23, 1984, each tank has a maximum storage capacity of less than seventy-five cubic meters (75 m3) (19,813 gallons), and the liquid stored in each tank has a maximum true vapor pressure of less than fifteen kiloPascals (15.0 kPa).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) 40 CFR 63, Subpart T - NESHAPs for Halogenated Solvent Cleaning
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, because this source does not use a cold solvent cleaning machine or any degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).

(b) 40 CFR 63 Subpart JJ - NESHAP: Wood Furniture Manufacturing
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations), 40 CFR 63, Subpart JJ (2J) (326 IAC 20-14), are not included in the permit, since this source does not manufacture wood furniture or wood furniture components, as defined in 40 CFR 63. 801, but instead uses pre-manufactured wood furniture or wood furniture components to manufacture mobile homes. Additionally, this source is not a major source of HAP emissions.

(c) 40 CFR 63 Subpart DDDD - NESHAPs: Plywood and Composite Wood Products
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart DDDD (4D), are not included in the permit, since this source does not manufacture plywood and/or composite wood products, but instead uses plywood and/or composite wood products to manufacture mobile homes. Additionally, this source is not a major source of HAP emissions.

(d) 40 CFR 63 Subpart MMMM - NESHAPs for Miscellaneous Metal Parts and Products Surface Coating
The requirements of the National Emission Standards for Hazardous Air Pollutants(NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (4M) (326 IAC 20-80), are not included in the permit, since this source does not apply any surface coatings to metal and is not a major source of HAPs, as defined in 40 CFR 63.2

(e) 40 CFR 63, Subpart PPPP - NESHAPS for Surface Coating of Plastic Parts and Products
The requirements of the National Emission Standards for Hazardous Air Pollutants(NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (4P) (326 IAC 20-81), are not included in the permit, since although this source applies 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products, as defined in § 63.4481(a), this source is not a major source of HAPs as defined in 40 CFR 63.2.

(f) 40 CFR 63, Subpart QQQQ - NESHAPS for Surface Coating of Wood Building Products
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (4Q) (326 IAC 20-79), are not included in the permit, since although this source applies surface coatings to wood building products, the source is not a major source of emissions of hazardous air pollutants (HAPs), located at a major source of HAPs, or is part of a major source of HAPs, as defined in 40 CFR 63.4681(b).

(g) 40 CFR 63, Subpart WWWW - NESHAPs: Reinforced Plastic Composites Production
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW (4W) (326 IAC 20-25), are not included in the permit, since this source is not a major source of HAPs, and does not produce reinforced plastic composites, as defined in §63.5935.

(h) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers, and Process Heaters
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20-95), are not included in the permit for the nineteen (19) natural gas-fired, direct-fired heaters, since this source is not a major source of HAPs, and is not located at, nor is a part of, a major source of HAP emissions.

(i) 40 CFR 63, Subpart CCCCCC - NESHAP for the Source Category Identified as Gasoline Dispensing Facilities (GDF)
The requirements of this National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Source Category Identified as Gasoline Dispensing Facilities (GDF), 40 CFR 63.11110, Subpart CCCCCC (6C), are not included in the permit, because the petroleum fuel [other than gasoline] dispensing facility is not used to dispense gasoline, as defined under 40 CFR 63.11132, and is therefore not a gasoline dispensing facility.

(j) 40 CFR 63, Subpart HHHHHH - NESHAPs: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H) are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR § 63.2, it does not spray apply coatings containing compounds of chromium, lead, manganese, nickel, or cadmium to metal or plastic parts, does not perform paint stripping using methylene chloride (MeCl), and does not perform autobody refinishing. Additionally, the gypsum-based ceiling texture applied to wallboard does not contain compounds of chromium, lead, manganese, nickel, or cadmium and wallboard is not a metal or plastic part. Finally, although the Moores Int. Wood Stain used for touch-up coating in Plants D, E, & F contains chromium, the stain is not spray applied, but is applied by hand (wipe), roll, bead, and/or brush application.

(k) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources
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 (6J), are not included in the permit for the nineteen (19) natural gas-fired, direct-fired heaters, since although this source is an area source of hazardous air pollutants (HAP), as defined in §63.2, the nineteen (19) natural gas-fired heaters are each a direct-fired process unit and not a boiler, as defined in 40 CFR 63.11237.

(l) 40 CFR 63 Subpart QQQQQQ - NESHAPs for Wood Preserving Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart QQQQQQ (6Q), are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR § 63.2, it does not perform wood preserving, as defined in §63.11433, but instead applies surface coatings to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts during mobile home assembly

(m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination - Entire Source

The following state rules are applicable to the source:

(a) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
LaGrange County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply, and are not included in the permit.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-3 (Emission Offset)
LaGrange County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply, and are not included in the permit.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the combined surface coating activities in Plants D, E, and F is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of total combined HAPs. However, the source shall limit the potential to emit of HAPs from the combined surface coating activities in Plants D, E, and F to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of total combined HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

(e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this new mobile homes manufacturing source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not

located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(f) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.

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

(1) 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.

(2) 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.

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

(i) 326 IAC 9-1 (Carbon Monoxide Emission Limits)
There is no applicable emission limit listed in 326 IAC 9-1-2 for any of the facilities at this source. Therefore, the requirements of 326 IAC 9-1 are not included in the permit.

(j) 326 IAC 10 (Nitrogen Oxides Rules)
This new mobile homes manufacturing source is not located in either Lake or Floyd County. Therefore, it is not subject to the requirements of 326 IAC 10.

(k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability Determination - Individual Facilities

Surface Coating Operations

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

(1) The Plants D, E, and F product assembly workstations for applying miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts are each not subject to 326 IAC 6-3, since surface coating using, using hand (wipe), roll, bead, and brush application methods are exempted under 326 IAC 6-3-1(b)(5) through (8).

(2) The process of applying ceiling texture to wallboard is assumed to generate no particulate overspray emissions. The material is a paste-like substance (e.g. wet plaster or spackle) that adheres to the wallboard or deposits near the applicator with no particulate emissions. Therefore, the requirements of 326 IAC 6-3 do not apply and are not included in the permit.

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

(1) The unlimited potential to emit VOCs, from each of the Plants D, E, and F, is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions

from each Plant to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- The total VOC input to Plants D, E, and F, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints, undercoatings, ceiling textures, cleaners, and VOC solvents, and excluding VOC input to the wood furniture/cabinet coating activities which are regulated under 326 IAC 8-2-12, shall not exceed 24.9 tons of VOC per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

  Compliance with this limit shall limit the potential to emit VOC from Plants D, E, and F, each, to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

(2) The Plants D, E, and F wood furniture/cabinet coating activities are otherwise subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), therefore, the requirements of 326 IAC 8-1-6 do not apply and are not included in the permit for the Plants D, E, and F wood furniture/cabinet coating activities.

(3) According to the MSDS submitted by the source, the gypsum-based ceiling texture used in each of the Plants D, E, and F wallboard coating areas is VOC free. Consequently, the potential VOC emissions are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply and are not included in the permit for application of the gypsum-based ceiling texture in each of the Plants D, E, and F.

(c) 326 IAC 8-2-2 (Automobile and light duty truck coating operations)
Although the mobile homes manufactured by the source have wheels and can be pulled by a truck, they do not meet the definition of an automobile or light duty truck, since they are not designed primarily for the purpose of transportation and are not a derivative of such vehicles. Therefore, the requirements of 326 IAC 8-2-2 do not apply and are not included in the permit.

(d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
This new mobile homes manufacturing source, located in LaGrange County, is approved for construction after the applicability date of July 1, 1990, has actual emissions of greater than fifteen (15) pounds of VOCs per day before add-on controls. However, this source applies miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts under the Standard Industrial Classification Code of major group 24: Lumber And Wood Products, Except Furniture. Therefore, since the source is not located in Lake County or Porter County and does not perform surface coating under any of the categories listed under 326 IAC 8-2-9(a)(1), the requirements of 326 IAC 8-2-9 do not apply and are not included in the permit.

(e) 326 IAC 8-2-10 (Flat wood panels; manufacturing operations)
This new mobile homes manufacturing source, located in LaGrange County, is approved to commence construction after the applicability date of July 1, 1990, and has actual emissions of greater than fifteen (15) pounds of VOCs per day before add-on controls. However, this source does not manufacture or apply coatings to flat wood panels, but instead applies miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, drywall, shingles, vinyl flooring, and fiberglass parts. Therefore, the requirements of 326 IAC 8-2-10 do not apply and are not included in the permit.

(f) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This new mobile homes manufacturing source, located in LaGrange County, is approved to commence construction after the applicability date of July 1, 1990 and will have actual emissions greater than fifteen (15) pounds of VOC per day. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one of the following application methods:

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

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

(g) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The miscellaneous solvent cleanup activities that occur in the Plants D, E, and F product assembly workstations and wallboard coating areas, are not of a type described in subdivisions in 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, 326 IAC 8-3-2 does not apply to the cleanup solvent usage at this source, and the requirements are not included in the permit.

(h) 326 IAC 8-6-1 (Organic Solvent Emission Limitations)
This mobile homes manufacturing source, located in LaGrange County, and has a potential to emit VOCs greater than one hundred (100) tons per year. However, this source is approved to commence construction 2012, and has elected to limit its VOC emissions to less than one hundred (100) tons per year under the FESOP Program. Therefore, the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) do not apply and are not included in the permit.

(i) 326 IAC 8-11-3 (Volatile Organic Compounds; Wood Furniture Coatings)
This new mobile homes manufacturing source is approved to commence construction after the applicability date of July 1, 1990, and has a combined potential to emit of volatile organic compounds (VOCs) greater than twenty-five (25) tons per year. However, this source is located in LaGrange County and does not manufacture wood furniture, as defined in 326 IAC 8-11-1(2), but instead uses pre-manufactured wood furniture or wood furniture components in the manufacture of mobile homes, under Standard Industrial Classification (SIC) code 2451 (Manufacturing - Mobile Homes). Therefore, the requirements of 326 IAC 8-3-11 do not apply and are not included in the permit.

(j) There are no other 326 IAC 8 Rules that are applicable to the Surface Coating Operations.

Woodworking Operation

(a) 326 IAC 1-6-3 (Preventive Maintenance Plan)
A control device is required to limit particulate emissions (PM, PM10, and PM2.5) from the Plants D, E, and F mill shop woodworking operations to less than PSD thresholds. Therefore, a PMP is required for these units and their associated control device(s).

(b) 326 IAC 1-7 (Stack Height)
Pursuant to 326 IAC 1-7-1, this rule applies to all sources having exhaust gas stacks through which a potential (before limitations/controls) of twenty-five (25) tons per year or more of particulate matter and/or sulfur dioxide are emitted. The uncontrolled particulate emissions from Plants D, E, and F mill shop woodworking operations are 266.28 tons per year, each. Therefore, this source is subject to this 326 IAC 1-7, and the requirements are included in Section C of the permit.

See Appendix A for the detailed calculations.

(c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the Plants D, E, and F mill shop woodworking operations shall not exceed the corresponding pound per hour limitation listed in the table below:

Emission Unit	Process Weight Rate (tons/hr)	326 IAC 6-3 Allowable Emission Rate (lbs/hour)	Unlimited/ Uncontrolled PTE PM (lbs/hour)
Plant D mill shop woodworking operation	5.13	12.27	60.80
Plant E mill shop woodworking operation	5.13	12.27	60.80
Plant F mill shop woodworking operation	5.13	12.27	60.80

These limitations were calculated as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour, or thirty (30) tons 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 uncontrolled potential particulate emissions from each of the Plants D, E, and F mill shop woodworking operations are greater than the 326 IAC 6-3-2 allowable emissions. Therefore, each of the baghouses shall be in operation at all times the corresponding woodworking operation is in operation, in order to comply with these limits.

Note: The Plants D, E, and F mill shop baghouses have each been determined integral to the process; therefore, the baghouses shall be in operation and control emissions from the Plants D, E, and F mill shop woodworking at all times that the corresponding Plants D, E, and F mill shop woodworking is in operation.

See Appendix A, for the detailed calculations.

Insignificant Brazing, Cutting, Soldering, and Welding

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The potential particulate emissions from the Brazing, Cutting, Soldering, and Welding Operations at Plants D, E, and F, combined, are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the Brazing, Cutting, Soldering, and Welding Operations at Plants D, E, and F are each exempt from 326 IAC 6-3, and the requirements are not included in the permit.

See Appendix A, for the detailed calculations.

Insignificant Wood Cutting, Drilling, Grinding, Machining, Routing, Sanding, and/or Sawing

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The potential particulate emissions from the Wood Cutting, Drilling, Grinding, Machining, Routing, Sanding, and/or Sawing Operations at Plants D, E, and F, combined, are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the Wood Cutting, Drilling, Grinding, Machining, Routing, Sanding, and/or Sawing Operations at Plants D, E, and F are each exempt from 326 IAC 6-3, and the requirements are not included in the permit.

Insignificant Natural Gas Combustion

(a) 326 IAC 4-2-2 (Incinerators)
The nineteen (19) natural gas-fired, direct-fired heaters, are each not an incinerator, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 do not apply, and are not included in the permit.

(b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The nineteen (19) natural gas-fired, direct-fired heaters are each not a source of indirect heating, as defined in 326 IAC 1-2-19 "Combustion for Indirect Heating". Therefore, the requirements of 326 IAC 6-2 do not apply, and are not included in the permit.

(c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The one nineteen (19) natural gas-fired, direct-fired heaters, each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2). Therefore, each of these units is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

(d) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The unlimited potential to emit SO2 from the nineteen (19) natural gas-fired, direct-fired heaters is less than twenty-five (25) tons/year, or ten (10) pounds/hour, combined. Therefore, the requirements of 326 IAC 7-1.1 do not apply, and are not included in the permit.

See Appendix A for the detailed calculations.

(e) 326 IAC 9-1 (Carbon Monoxide Emission Limits)
The two (2), 1.0 MMBtu/hr heated wash units are not one of the source types listed in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1 (Carbon Monoxide Emission Limits) do not apply, and are not included in the permit.

(f) 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Category)
The nineteen (19) natural gas-fired, direct-fired heaters each do not meet the definition of an affected facility, as defined in 326 IAC 10-3-1(a), because each heater has a maximum heat input capacity of less than two hundred fifty million (250,000,000) British thermal units per hour (MMBtu). Therefore, the requirements of 326 IAC 10-3 do not apply, and are not included in the permit.

Insignificant Fuel Dispensing and Storage Facilities

(a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The potential to emit VOCs from the petroleum fuel [other than gasoline] dispensing facility, and the VOC and HAP storage containers/vessels for storing lubricating oils, hydraulic oils, machining oils, and machining fluids, each, is less than twenty-five (25) tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply and are not included in the in the permit.

(b) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. The petroleum fuel [other than gasoline] dispensing facility, and the VOC and HAP storage containers/vessels for storing lubricating oils, hydraulic oils, machining oils, and machining fluids, each, have maximum capacities less than 39,000 gallons. Therefore, the requirements of this rule are not applicable to these facilities and are not included in this permit.

(c) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)
This existing stationary source is located in LaPorte County, which is not one of the counties specifically listed in 326 IAC 8-4-1. Additionally, the petroleum fuel [other than gasoline]

dispensing facility is not a gasoline dispensing facility, as defined in 326 IAC 8-4-6(a)(8). Therefore, the requirements of 326 IAC 8-4-6 do not apply, and are not included in the permit.

(d) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
This source is located in LaGrange County, not Clark, Floyd, Lake, or Porter Counties. Therefore, the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) do not apply, and are not included in this permit.

(e) There are no other 326 IAC 8 Rules that are applicable to the existing storage tanks.

Compliance Determination, Monitoring and Testing Requirements

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

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

(a) The compliance determination requirements applicable to this source are as follows:

(1) The Surface Coating Operations at Plants D, E, and F product assembly workstations and the wallboard coating areas have applicable compliance determination conditions as specified in the table below:

Emission Unit/Control	Operating Parameters	Method
Surface Coating Operations at Plants D, E, and F (product assembly workstations and wallboard coating areas)	HAP and VOC content	Preparing or obtaining the “as supplied” and “as applied” HAP/VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

(A) Confirmation of the HAP content of the coatings used in the Surface Coating Operations at Plants D, E, and F product assembly workstations and the wallboard coating areas, is required to determine compliance with the provisions of 326 IAC 2-8-4 (FESOP).

(B) Confirmation of the VOC content of the coatings used in the Surface Coating Operations at Plants D, E, and F product assembly workstations and the wallboard coating areas is required to determine compliance with the provisions of 326 IAC 2-8-4 (FESOP) and in order to render the provisions of 326 IAC 2-2 (PSD) and 326 IAC 8-1-6 (BACT) not applicable.

(2) In order to comply with the 326 IAC 6-3-2 allowable PM emission rates and the PSD Minor PM, PM10, and PM2.5 limitations in the permit, the Plants D, E, and F vacuum collection systems with fabric filter dust collectors controlling particulate emissions in each of the Mill

Room woodworking areas, shall be in operation and control emissions from the woodworking equipment at all times that the woodworking equipment is in operation.

(3) There are no specific compliance determination requirements for the welding operations, natural gas combustion units, or the fuel dispensing and storage facilities, at this source.

(b) There are no specific testing requirements associated with any of the emission units, at this source.

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

(1) The vacuum collection systems with fabric filter dust collectors controlling each of the Plants D, E, and F Mill Room woodworking areas have applicable compliance monitoring conditions as specified below:

Emission Unit & Control Device	Parameter	Frequency	Range	Excursions and Exceedances
vacuum collection systems with fabric filter dust collector stack exhausts	Visible Emissions	Once per day	normal/ abnormal	Response Steps

These monitoring conditions are necessary because the vacuum collection systems with fabric filter dust collectors used in conjunction with the Plants D, E, and F Mill Room woodworking areas must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), and the limits that render 326 IAC 2-7 (Part 70 Permit Program), and 326 IAC 2-2 (PSD) not applicable.

(2) There are no specific compliance monitoring requirements for the surface coating operations at Plants D, E, and F product assembly workstations and the wallboard coating areas, welding operations, natural gas combustion units, or the fuel dispensing and storage facilities at this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 12, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F087-32005-00083. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.

(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.in.gov/idem

Appendix A: Emissions Calculations
Emission Summary

Company Name: Champion Home Builders, Inc.
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

		Unlimited/uncontrolled Potential to Emit (tons/year)				
		Emissions Generating Activity				
Category	Pollutant	Surface Coating	Woodworking	MIG Welding	Natural Gas Combustion	**TOTAL**
Criteria Pollutants	PM	0.00	798.85	2.28	0.05	801.18
	PM10	0.00	798.85	2.28	0.20	801.33
	PM2.5	0.00	798.85	2.28	0.20	801.33
	SO2	0	0	0	0.02	0.02
	NOx	0	0	0	2.62	2.62
	VOC	1,820.68	0	0	0.14	1,820.82
	CO	0	0	0	2.20	2.20
	GHGs as CO2e	0	0	0	3,159.57	3,159.57
Hazardous Air Pollutants	2-butoxyethanol	1.08	0	0	0	1.08
	Benzene	0	0	0	5.50E-05	5.50E-05
	Cumene	1.10E-04	0	0	0	1.10E-04
	Dichlorobenzene	0	0	0	3.14E-05	3.14E-05
	Ethyl Benzene	0.04	0	0	0	0.04
	Ethylene Glycol	7.80	0	0	0	7.80
	Formaldehyde	0	0	0	1.96E-03	1.96E-03
	Hexane	4.37	0	0	4.71E-02	4.42
	MDI	0.01	0	0	0	0.01
	Toluene	18.02	0	0	8.90E-05	18.02
	Xylenes	16.13	0	0	0	16.13
	Cadmium	0	0	0	2.88E-05	2.88E-05
	Chromium	0.03	0	4.38E-04	2.88E-05	0.03
	Cobalt	0.49	0	0	0	0.49
	Lead	0	0	0	1.31E-05	1.31E-05
	Manganese	0	0	0.14	9.94E-06	0.14
	Nickel	0	0	4.38E-04	5.50E-05	4.93E-04
	Totals	**47.992**	**0.000**	**0.140**	**0.049**	**48.18**
					Worse Case HAP	**18.02**

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

Appendix A: Emissions Calculations
Emission Summary

Company Name: Champion Home Builders, Inc.
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

	Unlimited Potential to Emit of the Entire Source After Integral Control (tons/year)					
		Emissions Generating Activity				
Category	Pollutant	Surface Coating	Woodworking [(1)]	MIG Welding	Natural Gas Combustion	**TOTAL**
Criteria Pollutants	PM	0.00	39.94	2.28	0.05	42.27
	PM10	0.00	39.94	2.28	0.20	42.42
	PM2.5	0.00	39.94	2.28	0.20	42.42
	SO2	0	0	0	0.02	0.02
	NOx	0	0	0	2.62	2.62
	VOC	1,820.68	0	0	0.14	1,820.82
	CO	0	0	0	2.20	2.20
	GHGs as CO2e	0	0	0	3,159.57	3,159.57
Hazardous Air Pollutants	2-butoxyethanol	1.08	0	0	0	1.08
	Benzene	0	0	0	5.50E-05	5.50E-05
	Cumene	1.10E-04	0	0	0	1.10E-04
	Dichlorobenzene	0	0	0	3.14E-05	3.14E-05
	Ethyl Benzene	0.04	0	0	0	0.04
	Ethylene Glycol	7.80	0	0	0	7.80
	Formaldehyde	0	0	0	1.96E-03	1.96E-03
	Hexane	4.37	0	0	4.71E-02	4.42
	MDI	0.01	0	0	0	0.01
	Toluene	18.02	0	0	8.90E-05	18.02
	Xylenes	16.13	0	0	0	16.13
	Cadmium	0	0	0	2.88E-05	2.88E-05
	Chromium	0.03	0	4.38E-04	2.88E-05	0.03
	Cobalt	0.49	0	0	0	0.49
	Lead	0	0	0	1.31E-05	1.31E-05
	Manganese	0	0	0.14	9.94E-06	0.14
	Nickel	0	0	4.38E-04	5.50E-05	4.93E-04
	Totals	**47.992**	**0.000**	**0.140**	**0.049**	**48.18**
					Worse Case HAP	**18.02**

Total emissions based on rated capacity at 8,760 hours/year.
(1) The Potential to emit (PTE) for particulate matter (PM/PM10/PM2.5) were calculated after consideration of the integral controls. See the above table, and the "Integral Part of the Process" Determination section of the TSD for more detail. This integral determination does not negate the requirement for a limit to comply with 326 IAC 2-2 (Prevention of Significant Deterioration)

Appendix A: Emissions Calculations
Emission Summary

Company Name: Champion Home Builders, Inc.
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

	Limited Potential To Emit of the Entire Source (tons/year)					
		Emissions Generating Activity				
Category	Pollutant	Surface Coating (1)	Woodworking (2)	MIG Welding	Natural Gas Combustion	**TOTAL**
Criteria Pollutants	PM	0.00	216.55	2.28	0.05	218.87
	PM10	0.00	96.32	2.28	0.20	98.79
	PM2.5	0.00	96.32	2.28	0.20	98.79
	SO2	0	0	0	0.02	0.02
	NOx	0	0	0	2.62	2.62
	VOC	98.8	0	0	0.14	98.94
	CO	0	0	0	2.20	2.20
	GHGs as CO2e	0	0	0	3,159.57	3,159.57
Hazardous Air Pollutants	2-butoxyethanol	1.08	0	0	0	1.08
	Benzene	0	0	0	5.50E-05	5.50E-05
	Cumene	1.10E-04	0	0	0	1.10E-04
	Dichlorobenzene	0	0	0	3.14E-05	3.14E-05
	Ethyl Benzene	0.04	0	0	0	0.04
	Ethylene Glycol	7.80	0	0	0	7.80
	Formaldehyde	0	0	0	1.96E-03	1.96E-03
	Hexane	4.37	0	0	0.05	4.42
	MDI	0.01	0	0	0	0.01
	Toluene	9.5	0	0	8.90E-05	9.50
	Xylenes	9.5	0	0	0	9.50
	Cadmium	0	0	0	2.88E-05	2.88E-05
	Chromium	0.03	0	4.38E-04	2.88E-05	0.03
	Cobalt	0.49	0	0	0	0.49
	Lead	0	0	0	1.31E-05	1.31E-05
	Manganese	0	0	0.14	9.94E-06	0.14
	Nickel	0	0	4.38E-04	5.50E-05	4.93E-04
	Totals	**24.5**	**0.000**	**0.140**	**0.049**	**24.69**
					Worse Case HAP	**9.5 (1)**

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

(1) Limited PTE based upon VOC and HAP input limits to comply with 326 IAC 2-8 (FESOP), and to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

(2) Limited PTE PM, PM10, and PM2.5 based on a pound per hour (lb/hr) limit to render 326 IAC 2-2 (PSD) not applicable.

Appendix A: Emissions Calculations
Particulate and Volitile Organic Compound (VOC) Emissions from
Surface Coating Operations at Plants D, E, and F

Company Name: Champion Home Builders, Inc.
Address: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids) *	Maximum Material Usage (gal/unit)	Maximum Throughput Capacity (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Actual VOC pounds per day	Potential VOC pounds per day	Actual VOC tons per year	Potential VOC tons per year	Particulate Potential (ton/yr) **	Transfer Efficiency
Miscellaneous Materials Coating Operations Collectively Applied at Plants D, E, & F																	
F2100A ITW Foamseal	10.34	100.00%	0%	100.00%	0%	0%	34.111	1.0	10.34	10.34	352.70	2,821.63	8,464.88	366.81	1,544.84	0.00	100%
Shingle Tite Tubes	9.17	30.01%	0%	30.01%	0%	70.0%	2.433	1.0	2.75	2.75	6.70	53.59	160.77	6.97	29.34	0.00	100%
Plastic Roof Cement	9.17	30.01%	0%	30.01%	0%	70.0%	7.415	1.0	2.75	2.75	20.42	163.32	489.97	21.23	89.42	0.00	100%
IPS Weld On	7.22	90.00%	25.0%	65.00%	25.0%	10.0%	0.025	1.0	6.26	4.69	0.12	0.92	2.76	0.12	0.50	0.00	100%
Bostik Super-Tak HP	5.60	82.00%	17.1%	64.90%	17.1%	12.2%	0.446	1.0	4.38	3.63	1.62	12.96	38.87	1.68	7.09	0.00	100%
Sun Adhesive C-557	9.00	36.89%	0%	36.89%	0%	49.6%	6.720	1.0	3.32	3.32	22.31	178.49	535.48	23.20	97.73	0.00	100%
Harvey Seal	13.91	33.01%	0%	33.01%	0%	67.0%	0.124	1.0	4.59	4.59	0.57	4.54	13.62	0.59	2.48	0.00	100%
Seam Sealer SU 92	7.60	85.00%	0%	85.00%	0%	24.0%	0.010	1.0	6.46	6.46	0.06	0.50	1.49	0.06	0.27	0.00	100%
Stove and Fireplace Motar	15.01	25.00%	25.0%	0.00%	25.0%	75.0%	0.093	1.0	0	0	0	0	0	0	0	0	100%
Bostik Chem Calk 900	10.17	6.20%	0%	6.20%	0%	91.3%	0.027	1.0	0.63	0.63	0.02	0.14	0.41	0.02	0.08	0.00	100%
Oatey ABS Cement	7.84	88.00%	10.0%	78.00%	10.0%	12.0%	0.148	1.0	6.79	6.11	0.91	7.24	21.73	0.94	3.97	0.00	100%
Ohio Acoustical Sealant	13.23	1.36%	0%	1.36%	0%	77.7%	2.688	1.0	0.18	0.18	0.48	3.87	11.61	0.50	2.12	0.00	100%
Spred Ultra Flat Latex Paint	12.10	35.62%	30.0%	5.62%	30.0%	39.0%	9.516	1.0	0.97	0.68	6.47	51.77	155.31	6.73	28.34	0.00	100%
W.W. Mobilatex Adhesive	9.57	52.98%	0%	52.98%	0%	47.0%	0.025	1.0	5.07	5.07	0.12	0.99	2.98	0.13	0.54	0.00	100%
Speed Demon Acrylic Caulk	14.60	8.45%	0%	8.45%	0%	80.0%	2.225	1.0	1.23	1.23	2.74	21.95	65.84	2.85	12.02	0.00	100%
Touch-Up Coating of Wood Cabinets Collectively Applied at Plants D, E, & F																	
Deft 48w5 Wood Stain	8.56	10.10%	0%	10.10%	0%	95.40%	0.002	1.0	0.86	0.86	2.07E-03	0.02	0.05	2.16E-03	0.01	0.00	100%
Moores Int Wood Stain	7.60	66.45%	0%	66.45%	0%	44.00%	0.074	1.0	5.05	5.05	0.37	2.99	8.97	0.39	1.64	0.00	100%
Solvent Cleaners Collectively Applied at Plants D, E, & F																	
Oatley Purple Primer/Cleaner	6.61	100.00%	60.00%	40.00%	60.00%	0.00%	0.025	1.0	6.61	2.65	0.06	0.52	1.56	0.07	0.28	0.00	100%
									Total Uncontrolled Potential To Emit:		**415.68**	3,325.44	**9,976.32**	432.31	**1,820.68**	**0.00**	

NOTES

Note: Actual usage based on 2,080 hrs/yr, or 8 hrs/day, 5 days/wk, and 52 weeks/yr.

Data for the above listed materials taken from MSDSs supplied by the source, and from the Historic MSDSs on file in IDEM's Virtual File Cabinet (VFC) for Permit No. F087-23808-00045.

All of the coatings used in the manufacture of the mobile home modular units are applied using a handheld caulking gun, or using roll or brush application methods; therefore, it is assumed that the transfer efficiency is 100% and no particulate overspray emissions are generated. All cleaners/solvents are applied via handwipe.

The adhesive products F2100A ITW Foamseal and Pemco Adhesive are polymerizing adhesives that contain methylene bis(phenyl isocyante) (MDI) and polymeric MDI (PMDI). PMDI completely polymerizes into the product and is not emitted.

Only trace amounts of MDI flash-off during product reaction. For Foamsean F2100, the material is 50% MDI and 50% PMDI. Computations of the MDI flash-off emissions were provided by the source and determined using "MDI Emissions Reporting Guidelines", published by The Society of the Plastics Industry, as 5e-07 lb MDI per lb-F2100A Foamsel used. Based on a maximum material usage rate of 34.11 gal/hr, this produces a VOC and MDI emission rate of 7.7e-04 tons per year.

According to the MSDS submitted by the source, the gypsum-based ceiling texture used in the wallboard coating area is VOC and HAP free. The inert material is mixed with water and applied using airless spray. The consistency of the mixture is such that particulate emissions are assumed negligible.

METHODOLOGY

Density (Lb/Gal) = [Specific Gravity of the material (from the MSDS) * Density of Water (lb/gal)], or as reported on MSDS, as applicable. The density of water is 8.343 lbs/gal @ 5^{0}F.
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)
Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 8 hrs/day
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (2080 hr/yr) * (1 ton/2000 lbs)
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) * Transfer Efficency
Total Uncontrolled Potential to Emit (tons/yr) = Sum of All Coatings and Solvents Applied

Appendix A: Emissions Calculations
Hazardous Air Pollutant (HAP) Emissions from the
Surface Coating Operations at Plants D, E, and F

Company Name: Champion Home Builders, Inc.
Address: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Ethyl Benzene	Weight % Hexane	Weight % Toluene	Weight % Xylene	HAP EMISSION RATES (TONS PER YEAR) Cumene	Ethyl Benzene	Hexane	Toluene	Xylene	Total HAPs
Miscellaneous Materials Coating Operations Collectively Applied at Plants D, E, & F														
F2100A ITW Foamseal[1]	10.34	34.111	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Shingle Tite Tubes	9.17	2.433	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Plastic Roof Cement	9.17	7.415	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
IPS Weld ON	7.22	0.025	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Bostik Super-Tak H.P.	5.60	0.446	1	0%	0%	40.00%	0%	0%	0	0	4.37	0	0	4.37
Sun Adhesive C-557[2]	9.00	6.720	1	0%	0%	0%	1.05%	6.05%	0	0	0	2.78	16.03	18.81
Harvey Seal	13.91	0.124	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Seam Sealer SU 92	7.60	0.010	1	0%	0%	0%	35.00%	0%	0	0	0	0.11	0	0.11
DAP Stove and Fireplace Mortar	15.01	0.093	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Bostik Chem Calk 900 (White)[3]	10.17	0.027	1	0.01%	0.90%	0%	0%	4.11%	1.10E-04	0.01	0	0	0.05	0.06
Oatley ABS Cement	7.84	0.148	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Ohio Acoustical Sealant	13.23	2.688	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Spred Ultra Flat Latex Paint	13.23	2.688	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
W.W. Mobilatex Adhesive	12.10	9.516	1	0%	0%	0%	3.00%	0%	0	0	0	15.13	0	15.13
Speed Demon Acrylic Caulk[4]	9.57	0.025	1	0%	0%	0%	0%	0.01%	0	0	0	0	1.03E-04	0.00
Touch-Up Coating of Wood Cabinets Collectively Applied at Plants D, E, & F														
Deft 48w5 Wood Stain	8.56	0.002	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
Moores Int. Wood Stain[5]	7.60	0.074	1	0%	1.20%	0%	0%	1.99%	0	0.03	0	0	0.05	0.08
Solvent Cleaners Collectively Applied at Plants D, E, & F														
Oatley Purple Primer/Cleaner	6.61	0.025	1	0%	0%	0%	0%	0%	0	0	0	0	0	0
								Total Uncontrolled Potential to Emit (tons per year):	**1.10E-04**	**0.04**	**4.37**	**18.02**	**16.13**	(see below)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % 2-butoxyethanol	Weight % Ethylene Glycol	Weight % MDI	Weight % Chromium Compounds	Weight % Cobalt Compounds	HAP EMISSION RATES (TONS PER YEAR) 2-butoxyethanol	Ethylene Glycol	MDI	Chromium Compounds	Cobalt Compounds	**Total HAPs**
Miscellaneous Materials Coating Operations Collectively Applied at Plants D, E, & F														
F2100A ITW Foamseal (1)	10.34	34.111	1	0%	0%	5.00E-07	0%	0%	0	0	7.72E-04	0	0	**7.72E-04**
Shingle Tite Tubes	9.17	2.433	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Plastic Roof Cement	9.17	7.415	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
IPS Weld ON	7.22	0.025	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Bostik Super-Tak H.P.	5.60	0.446	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Sun Adhesive C-557 (2)	9.00	6.720	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Harvey Seal	13.91	0.124	1	10.00%	0%	0%	0%	0%	0.75	0	0	0	0	**0.75**
Seam Sealer SU 92	7.60	0.010	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
DAP Stove and Fireplace Mortar	15.01	0.093	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Bostik Chem Calk 900 (White) (3)	10.17	0.027	1	0%	0%	1.10%	0%	0%	0	0	0.01	0	0	**0.01**
Oatley ABS Cement	7.84	0.148	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Ohio Acoustical Sealant	13.23	2.688	1	0%	5.0%	0%	0%	0%	0	7.79	0	0	0	**7.79**
Spred Ultra Flat Latex Paint	13.23	2.688	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
W.W. Mobilatex Adhesive	12.10	9.516	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
Speed Demon Acrylic Caulk (4)	9.57	0.025	1	0%	0.90%	0%	0%	0%	0	0.01	0	0	0	**9.25E-03**
Touch-Up Coating of Wood Cabinets Collectively Applied at Plants D, E, & F														
Deft 48w5 Wood Stain	8.56	0.002	1	0.10%	5.00%	0%	0%	0%	9.00E-05	4.50E-03	0	0	0	**4.59E-03**
Moores Int. Wood Stain (5)	7.60	0.074	1	13.40%	0%	0%	1.40%	20.00%	0.33	0	0	0.03	0.49	**8.58E-01**
Solvent Cleaners Collectively Applied at Plants D, E, & F														
Oatley Purple Primer/Cleaner	6.61	0.025	1	0%	0%	0%	0%	0%	0	0	0	0	0	**0**
								Total Uncontrolled Potential to Emit (tons per year):	**1.08**	**7.80**	**0.01**	**0.03**	**0.49**	**47.99**

NOTES

(1) Methylene Bis(phenyl isocyante) (MDI) flash-off emissions for the Foamsean F2100 adhesive material provided by the source based on "MDI Emissions Reporting Guidelines", published by The Society of the Plastic Industry. The MDI emission factor is 5e-07 lb/lb-F2100A Foamseal used for this product, which is based on a 50% MDI content.
(2) The Sun Adhesive C-557 contains up to 35% VM & P naphtha (CAS 64742-89-8), which contains 3% toluene and 3% xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).
(3) The Bostik Chem Calk 900 (White) contains up to 0.9% light aromatic solvent naptha (CAS 64742-95-6), which contains 1% cumene and 1% xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).
(4) The Speed Demon Acrylic Caulk contains up to 1% mineral spirits (petroleum distillates) (CAS 64742-88-7), which contains 1% xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).
(5) The Moores Int. Wood Stain contains up to 78.8% Stoddard Solvent (CAS 8052-41-3), which contains 1% xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).

METHODOLOGY

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % *8760 hrs/yr * 1 ton/2000 lbs.

Appendix A: Emissions Calculations
Particulate Emissions from the
Woodworking Operations at Plants D, E, and F

Company Name: Champion Home Builders, Inc.
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit NO: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

Emission Units Description	Inlet Grain Loading (gr/acf)	Air to Cloth Ratio Air Flow (acfm/ft^2)	Total Filter Area (ft^2)	Control Device Fan Flow Rate (acfm)	PM Control Efficiency * (%)	Potential PM/PM10/PM2.5 Emission Rate **				Process Weight Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (lb/hr)
						Before Controls		After Controls			
						(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)		
Vacuum System & Baghouses for PM Control:											
Plant D Sawmill	2.60	0.275	9,920	2,725	95.0%	60.80	266.28	3.04	13.31	10,265.00	12.27
Plant E Sawmill	2.60	0.275	9,920	2,725	95.0%	60.80	266.28	3.04	13.31	10,265.00	12.27
Plant F Sawmill	2.60	0.275	9,920	2,725	95.0%	60.80	266.28	3.04	13.31	10,265.00	12.27
				Total PM/PM10/PM2.5:		182.39	798.85	9.12	**39.94**		

Notes:

* Actual control efficiency is listed as 99.95% in the permit application, but a lower efficiency is used herein to provide greater operating flexibility which does not affect compliance with the allowable emission limits for these operations.

** The Potential to emit (PTE) for particulate matter (PM10 & PM2.5) were calculated after consideration of the controls. 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. This integral determination does not negate the requirement for a limit to comply with 326 IAC 2-2 (Prevention of Significant Deterioration).

** To form a conservative estimate, it is assumed that PM=PM10=PM2.5.

Methodology:
Potential Uncontrolled Emissions (lbs/hr) = Inlet Loading (grain/acf) * Air/Cloth Ratio (acfm/ft^2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr.
Potential Uncontrolled Emissions (tons/yr) = Inlet Loading (grain/acf) * Air/Cloth Ratio (acfm/ft^2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 tons/2,000 lbs.
Potential Controlled Emissions (lbs/hr) = Inlet Loading (grains/acf) * Air/Cloth Ration (acfm/ft2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr * (1 - Control efficeincy)
Potential Controlled Emissions (ton/yr) = Inlet Loading (grains/acf) * Air/Cloth Ration (acfm/ft2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * (1 - Control efficeincy)

Pursuant to 326 IAC 6-3-2(e) Manufacturing Processes, the allowable PM emission rate for process weight rates up to 60,000 lb/hr is determined using the following formula:

E = 4.1 * P^0.67 Where: E = allowable PM emission rate (lb/hr)
P = process weight rate (ton/hr)

PSD Avoidance Limitations						
Emission Units Description	PSD PM Limit (lb/hr)	Limited PTE (tons/yr)	PSD PM10 Limit (lb/hr)	Limited PTE (tons/yr)	PSD PM2.5 Limit (lb/hr)	Limited PTE (tons/yr)
Vacuum System & Baghouses for PM Control:						
Plant D Sawmill	16.48	72.18	7.33	32.11	7.33	32.11
Plant E Sawmill	16.48	72.18	7.33	32.11	7.33	32.11
Plant F Sawmill	16.48	72.18	7.33	32.11	7.33	32.11
	Total:	**216.55**	**Total:**	**96.32**	**Total:**	**96.32**

Baghouse Control Efficiency Required for Compliance with the PSD Limits	
PM Control Efficiency:	72.90%
Controlled PM:	**216.49**
PM10/PM2.5 Control Efficiency:	87.95%
Controlled PM10/PM2.5:	**96.26**

Appendix A: Emissions Calculations
Particulate and Hazardous Air Pollutant (HAP) Emissions from the
Welding Operations at Plants D, E, and F

Company Name: Champion Home Builders, Inc.
Address City IN Zip: 1500 N. Detroit Street, LaGrange, IN 46761
Permit No:: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per hour	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10 = PM2.5	Mn	Ni	Cr	PM = PM10 = PM2.5	Mn	Ni	Cr	
Metal Inert Gas (MIG)	1	100	100	5.20E-03	3.18E-04	1.00E-06	1.00E-06	0.520	0.032	1.00E-04	1.00E-04	0.032
EMISSION TOTALS												
Potential Emissions lbs/hr								0.52	0.032	1.00E-04	1.00E-04	0.03
Potential Emissions lbs/day								12.48	0.76	2.40E-03	2.40E-03	0.77
Potential Emissions tons/year								2.28	0.14	4.38E-04	4.38E-04	0.14

METHODOLOGY
Metal Inert Gas (MIG) Welding is also know as Gas Metal Arc Welding (GMAW) (SCC# 3-09-052)
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations
Criteria Pollutant and Hazardous Air Pollutant (HAP) Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100

Company Name: Champion Home Builders, Inc.
Source Address: 1500 N. Detroit Street, LaGrange, IN 46761
Op. Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Plant D			
Heaters 1 and 2	2	0.200	0.40
Heaters 3 and 4	2	0.400	0.80
Heaters 5 through 8	4	0.100	0.40
Plant E			
Heater 9	1	0.400	0.40
Heaters 10 and 11	2	0.800	1.60
Heater 12	1	0.125	0.125
Plant F			
Heaters 13 through 17	5	0.400	2.00
Heaters 18 and 19	2	0.125	0.25
Total	8		**5.98**

Maximum Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.98	52.34

Criteria Pollutant Emissions

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.050	0.199	0.199	0.016	2.62	0.14	2.20

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

HAPs Emissions

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	0.075	1.80	3.40E-03
Potential Emission in tons/yr	5.50E-05	3.14E-05	1.96E-03	0.047	8.90E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.31E-05	2.88E-05	3.66E-05	9.94E-06	5.50E-05

Total HAPs =	0.049	tons/yr
Worst Single HA P =	0.047	tons/yr

NOTES
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98).
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Greenhouse Gas Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100

Company Name: Champion Home Builders, Inc.
Source Address: 1500 N. Detroit Street, LaGrange, IN 46761
Op. Permit No.: F 087-32005-00083
Reviewer: Hannah L. Desrosiers

Maximum Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
5.98	1000	52.34

	Greenhouse Gases (GHGs)		
	CO2	**CH4**	**N2O**
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,140.46	0.060	0.058
Summed Potential Emissions in tons/yr	3,140.58		
CO2e Total in tons/yr	**3,159.57**		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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: Robert Geil
Champion Home Builders, Inc.
308 Sheridan Dr
Topeka, IN 46571

DATE: January 14, 2013

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

SUBJECT: Final Decision
FESOP
087-32005-00083

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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
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January 14, 2013

TO: LaGrange Co Public Library

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

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

Applicant Name: Champion Home Builders
Permit Number: 087-32005-00083

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 1/14/2013 Champion Home Builders, Inc. 087-32005-00083 (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		Robert Geil Champion Home Builders, Inc. 308 Sheridan Dr Topeka IN 46571 (Source CAATS)									
2		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
3		LaGrange Co Public Library 203 W Spring St Lagrange IN 46761-1899 *(Library)*									
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		Nate Black D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
8		Donald Wolf 1290 N SR 9 LaGrange IN 4761 *(Affected Party)*									
9		Timothy Grate PO Box 220 LaGrange IN 46761 *(Affected Party)*									
10		James Fry 807 S Townline Road LaGrange IN 46761 *(Affected Party)*									
11		Michael Fry 4180 N 100 E Howe IN 46746 *(Affected Party)*									
12		LaGrange County Dodge, Inc. PO Box 29 LaGrange IN 46761 *(Affected Party)*									
13		ATJ Real Estate Holding, LLC 7613 M-66 Sturgis MI 49091 (Affected Party)									
14		Glindom Realty, LLC PO Box 10010 Perrysburg OH 43552 *(Affected Party)*									
15		M & E Investments, LLC 1340 Industrial Drive LaGrange IN 46761 *(Affected Party)*									

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1		Strayer Family Limited Partnership 741 Parkview Ave Wauseon OH 43567 (Affected Party)									
2		Karl Brugger 1220 N SR 9 LaGrange IN 46761 *(Affected Party)*									
3											
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