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: June 4, 2013

RE: CMH Manufacturing West Plant #995 / 039-32976-00611

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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

CMH Manufacturing West Plant #995
(formerly known as Forest River Housing, Inc.)
66700 State Road 19
Wakarusa, Indiana 46573

(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. F039-32976-00611	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2013 Expiration Date: June 4, 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 modular/mobile home manufacturing facility.

Source Address:	66700 State Road 19, Wakarusa, Indiana 46573
General Source Phone Number:	(574) 533-5934
SIC Code:	2451 (Mobile Homes)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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) One (1) surface coating operation, identified as Building 1 - Floor Assembly Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air-assisted spray and airless spray and with emissions exhausting inside the building.

(b) One (1) surface coating operation, identified as Building 1 - Roof and Shell Area, constructed in 1995, with a maximum capacity of 1.0 shells/hour, with materials applied by extrusion, trowel, wipe, brush, and wand applicator and with emissions exhausting inside the building.

(c) One (1) surface coating operation, identified as Building 2 - Final Finish Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, aerosol can and air assist spray, and with emissions exhausting inside the building.

(d) One (1) woodworking operation, constructed in 1995, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions exhausting inside the building.

(e) One (1) surface coating operation, identified as Building 3 - Frame Shop, approved for construction in 2013, with a maximum capacity of 2.0 units per hour, using airless spray application, using dry filters as control, and exhausting to atmosphere or inside the building.

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) Thirty-one (31) natural gas fired space heaters and two (2) air make-up units, constructed in 1995, with a maximum total heat capacity of 7.17 MMBtu/hour and with emissions exhausting inside the building.

(b) One diesel fuel dispensing station, 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.

(c) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(d) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(e) Three (3) natural gas fired air make-up units, constructed in 2013, located in Building 3, with a maximum total heat capacity of 5.6 MMBtu/hour and with emissions exhausting inside the building.

(f) Eight (8) Welding stations, identified as Building 3 Welding, with a maximum capacity of 4.0 pounds per hour per station, with emissions exhausting inside the building.

(g) Torch Cutting operation, identified as Building 3 Torch Cutting, including the following:

(1) Two (2) Plasma cutting stations, with a maximum cutting rate of 4.0 inches per minute per station, with emissions exhausting inside the building.

(2) Two (2) Oxyacetylene torch stations, with a maximum cutting rate of 5.0 inches per minute per station, with emissions exhausting inside the building.

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, F039-32976-00611, 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 April 15 of each year to:

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.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 F039-32976-00611 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 CO_2 equivalent emissions (CO_2e) 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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

C.12 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.13 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.14 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.15 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

Records of required monitoring information include the following:

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

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

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.17 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.18 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:

(a) One (1) surface coating operation, identified as Building 1 - Floor Assembly Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air-assisted spray and airless spray and with emissions exhausting inside the building.

(b) One (1)surface coating operation, identified as Building 1 - Roof and Shell Area, constructed in 1995, with a maximum capacity of 1.0 shells/hour, with materials applied by extrusion, trowel, wipe, brush, and wand applicator and with emissions exhausting inside the building.

(c) One (1) surface coating operation, identified as Building 2 - Final Finish Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, aerosol can and air assist spray, and with emissions exhausting inside the building.

(d) One (1) surface coating operation, identified as Building 3 - Frame Shop, approved for construction in 2013, with a maximum capacity of 2.0 frames per hour, using airless spray application, using dry filters as control, and exhausting to atmosphere or 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 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

(a) The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that total PM_{10} emissions shall not exceed 38.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that the total $PM_{2.5}$ emissions shall not exceed 38.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The transfer efficiency for spray application in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall not be less than 75%.

(d) The control efficiency of the total enclosure in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall not be less than 80%, when using spray application.

Compliance with these limits, combined with potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at the source, shall limit source wide PTE of PM_{10} and $PM_{2.5}$ to less than 100 tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable to the Building 1 - Floor Assembly Area, the Permittee shall comply with the following when performing surface coating that is not subject to 326 IAC 8-2-12:

The VOC input (including dilution and cleaning solvents) at the Building 1 - Floor Assembly Area, other than used for wood furniture and cabinets, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit will limit the potential VOC emissions from the Building 1 - Floor Assembly Area to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable to the Building 1 - Floor Assembly Area.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the Building 1 - Floor Assembly Area, Building 1 - Roof and Shell Area, and Building 2 - Final Finish Area shall utilize one of the following application methods:

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

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

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

(a) When using spray coating, particulate from the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be controlled by a total enclosure, which constitutes an "equivalent control device" and satisfies 326 IAC 6-3-2(d).

(b) Particulate from Building 3 - Frame Shop shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Particulate Matter ($PM_{10}/PM_{2.5}$) Emissions Determination [326 IAC 2-8-4]

Compliance with Condition D.1.1 shall be determined by calculating the PM_{10} and $PM_{2.5}$ emissions associated with each coating applied in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area using the following equation:

$PM_{10}/PM_{2.5} = (\sum CU \times D \times W\%S) \times (1\text{-}TE/100) \times (1\text{-}CE/100) \times 1 \text{ ton}/2000 \text{ lb}$

Where:

$PM_{10}/PM_{2.5}$ = The total $PM_{10}/PM_{2.5}$ emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall equal 75% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

CE = The control efficiency (%) of the total enclosure. This value shall equal 80% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total $PM_{10}/PM_{2.5}$ emissions (ton/month) from the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area is equal to the sum of the $PM_{10}/PM_{2.5}$ emissions associated with each coating applied in these areas.

D.1.7 Particulate Control

(a) In order comply with Conditions D.1.1, D.1.4 and D.1.6, when using spray application, coating in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be performed inside a total enclosure for particulate control at all times that these areas are in operation.

(b) In order to comply with Conditions D.1.4(b), the dry particulate filters for particulate control shall be used at all times that Building 3 - Frame Shop is in operation.

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

D.1.8 Enclosure Monitoring

(a) Particulate from the surface coating in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be controlled by using a total enclosure, when using spray coating. If overspray is visibly escaping the total enclosure, the Permittee shall inspect the permanent total enclosure and do either of the following no later than four (4) hours after such observation:

(1) Repair the total enclosure so that no overspray visibly escapes the total enclosure or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly escapes the total enclosure or accumulates on the ground.

(b) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the total enclosure, or change in operations, so that overspray does not visibly escape the total enclosure or accumulate on the ground. These records must be maintained for five (5) years.

D.1.9 Dry Filter Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling Building 3 - Frame Shop. To monitor the performance of the filters, weekly observations shall be made of the overspray from Building 3 - Frame Shop while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM_{10} and $PM_{2.5}$ emission limits established in Condition D.1.1.

(1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(3) The transfer efficiency (TE) of the spray guns in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area.

(4) The control efficiency (CE) of the total enclosure in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area.

(b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limitation established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The cleanup solvent usage for each month.

(4) The total VOC emitted for each month.

(5) The total VOC emitted for each compliance period.

(c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain a log of those inspections required by D.1.8(b) and any actions taken as a result of the inspections.

(d) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of daily dry particulate filter inspections, weekly overspray observations, and monthly inspections. The Permittee shall include in its daily record when a dry particulate filter inspection is not performed and the reason for the lack of dry particulate filter inspection notation (e.g., the process did not operate that day).

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

D.1.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.6 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C – General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by a "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) One (1) woodworking operation, constructed in 1995, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions 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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 9.49 pounds per hour when operating at a process weight rate of 7000 pounds per hour.

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

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

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

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

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611

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: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611

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 AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611
Facility: Building 1 - Floor Assembly Area and Building 2 - Final Finish Area
Parameter: PM10
Limit: The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that total PM10 emissions shall not exceed 38.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

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

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

Submitted by:_____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611
Facility: Building 1 - Floor Assembly Area and Building 2 - Final Finish Area
Parameter: PM2.5
Limit: The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that total PM2.5 emissions shall not exceed 38.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

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

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

Submitted by:_____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611
Facility: Building 1 - Floor Assembly Area
Parameter: VOC Input (when performing surface coating that is not subject to 326 IAC 8-2-12)
Limit: The VOC input (including dilution and cleaning solvents) at the Building 1 - Floor Assembly Area, other than used for wood furniture and cabinets, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

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

☐ 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: CMH Manufacturing West Plant #995
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
FESOP Permit No.: F039-32976-00611

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

Page 1 of 2

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:	

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Transitioning to a Federally Enforceable State Operating Permit (FESOP) with New Source Review (NSR)

Source Description and Location

Source Name:	CMH Manufacturing West Plant #995 (formerly known as Forest River Housing, Inc.)
Source Location:	66700 State Road 19, Wakarusa, IN 46573
County:	Elkhart
SIC Code:	2451 (Mobile Homes)
Operation Permit No.:	F039-32976-00611
Permit Reviewer:	Heath Hartley

On March 20, 2013, the Office of Air Quality (OAQ) received an application from CMH Manufacturing West Plant #995 related to the construction and operation of new emission units at an existing stationary modular/mobile home manufacturing facility and transition from a MSOP to a FESOP with New Source Review (NSR).

Existing Approvals

The source has been operating under MSOP Renewal No. M039-28343-00611 issued on November 18, 2009*)*. Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

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

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. 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
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by CMH Manufacturing West Plant #995 on March 20, 2013, relating to the construction and operation of new emission units at an existing stationary modular/mobile home manufacturing facility and transition from a MSOP to a FESOP.

The source consists of the following permitted emission units:

(a) One (1) surface coating operation, identified as Building 1 - Floor Assembly Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air-assisted spray and airless spray and with emissions exhausting inside the building.

(b) One (1) surface coating operation, identified as Building 1 - Roof and Shell Area, constructed in 1995, with a maximum capacity of 1.0 shells/hour, with materials applied by extrusion, trowel, wipe, brush, and wand applicator and with emissions exhausting inside the building.

(c) One (1) surface coating operation, identified as Building 2 - Final Finish Area, constructed in 1995, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, aerosol can and air-assist spray, and with emissions exhausting inside the building.

(d) One (1) woodworking operation, constructed in 1995, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions exhausting inside the building.

(c) Insignificant activities consisting of the following:

(1) Thirty-one (31) natural gas fired space heaters and two (2) air make-up units, constructed in 1995, with a maximum total heat capacity of 7.17 MMBtu/hour and with emissions exhausting inside the building.

(2) One diesel fuel dispensing station, 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.

(3) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(4) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, and machining fluids.

The following is a list of the new emission units and pollution control devices:

(a) One (1) surface coating operation, identified as Building 3 - Frame Shop, approved for construction in 2013, with a maximum capacity of 2.0 units per hour, using airless spray application, using dry filters as control, and exhausting to atmosphere or inside the building.

(b) Insignificant activities consisting of the following:

(1) Three (3) natural gas fired air make-up units, constructed in 2013, located in Building 3, with a maximum total heat capacity of 5.6 MMBtu/hour and with emissions exhausting inside the building.

(2) Eight (8) Welding stations, identified as Building 3 Welding, with a maximum capacity of 4.0 pounds per hour per station, with emissions exhausting inside the building.

(3) Torch Cutting operation, identified as Building 3 Torch Cutting, including the following:

(A) Two (2) Plasma cutting stations, with a maximum cutting rate of 4.0 inches per minute per station, with emissions exhausting inside the building.

(B) Two (2) Oxyacetylene torch stations, with a maximum cutting rate of 5.0 inches per minute per station, with emissions exhausting inside the building.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before 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	230.9
PM_{10} (1)	231.3
$PM_{2.5}$	231.3
SO_2	negl.
NO_x	9.3
VOC	75.8
CO	6.9
GHGs as CO_2e	10,384

(1) 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".

HAPs	Potential To Emit (tons/year)
Glycol Ethers	4.0
TOTAL HAPs	9.3

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM_{10} and $PM_{2.5}$ are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants 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 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)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) 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.

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
Building 1 - Roof and Shell Area	0	0	0	0	0	19.7	0	0	5.3	3.8 Glycol Ethers
Building 1 - Floor Assembly Area	159.3	38.7(1)	38.7 (1)	0	0	42.6	0	0	2.0	0.1
Building 2 - Final Finish Area	10.8			0	0	9.2	0	0	1.9	0.1
Building 3 - Frame Shop	27.3	27.3	27.3	0	0	3.7	0	0	0	0
Woodworking	23.0	23.0	23.0	0	0	0	0	0	0	0
Nat. Gas Combustion	0.1	0.4	0.4	0	5.6	0.3	4.7	6712	negl.	0
LPG Combustion	0.1	0.2	0.2	negl.	3.7	0.3	2.2	3672	negl.	0
Welding/Torch Cutting	10.3	10.3	10.3	0	0	0	0	0	negl.	0
Total PTE of Entire Source	**230.9**	**99.9**	**99.9**	**negl.**	**9.3**	**75.8**	**6.9**	**10,384**	**9.3**	**4.0**
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

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**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) The PM10 and PM2.5 emissions from the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area have been limited in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable.

(a) FESOP Status

This existing 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 existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is 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).

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

(1) The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that total PM_{10} emissions shall not exceed 38.7 tons per twelve consecutive month period, with compliance determined at the end of each month.

(2) The coatings applied by the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall be limited such that the total $PM_{2.5}$ emissions shall not exceed 38.7 tons per twelve consecutive month period, with compliance determined at the end of each month.

(3) The transfer efficiency for spray application in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall not be less than 75%.

(4) The control efficiency of the total enclosure in the Building 1 - Floor Assembly Area and Building 2 - Final Finish Area shall not be less than 80%, when using spray application.

Compliance with these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} and $PM_{2.5}$ to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants is 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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of New Source Performance Standards for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are not applicable for the petroleum fuel storage containers because the tanks have a maximum storage capacities of less than seventy-five cubic meters (75 m^3) (19,813 gallons).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14) are not included for this source, 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, the source is not a major source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products Area Sources, 40 CFR 63, Subpart DDDD are not applicable, since this source does not manufacture plywood and/or composite wood products, but instead uses plywood and/or composite wood to manufacture mobile homes. Additionally, the source is not a major source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Plastic Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80) are not included in the permit for the surface coating units. Building 3 - Frame Shop does coat miscellaneous metal parts or products; however the source is not a major source of HAPs.

(d) The requirements for National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not applicable for the surface coating units at this source. Although this facility may apply 378 liters (100 gallons (gal)) per year, or more, of coatings that contain HAPs in the surface coating of plastic parts and products, as defined in 40 CFR 63.4481(a), this source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79) are not applicable for the surface coating units at this source. Although this source applies surface coatings to wood building products, the source is not a major source of HAPs.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area sources, 40 CFR 63, Subpart HHHHHH, are not applicable for this source, since this area source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coatings that contain chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates. 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.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Dispensing Facilities, 40 CFR 63 Subpart CCCCCC are not applicable because the dispensing facility uses diesel fuel instead of gasoline.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

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

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

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this 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.

(e) 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.

(f) 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.

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to 326 IAC 6-5, because the source does not have a potential fugitive particulate matter emission of twenty-five (25) tons per year or more.

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

(i) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.5 because it is not located in Lake County.

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

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

Surface Coating Operations

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(15), each of the surface coating operations that utilize spray application are subject to the requirements of 326 IAC 6-3, since each booth has the potential to use equal to or greater than five (5) gallons per day of surface coatings.

(1) Some of the coatings in the Building 1 - Floor Assembly Area are applied using spray coating, therefore the requirements of 326 IAC 6-3-2(d) are applicable when spray coating at this facility. When using spray coating, particulate from the Building 1 - Floor Assembly Area shall be controlled by a total enclosure, which constitutes an "equivalent control device" and satisfies 326 IAC 6-3-2(d).

(2) Some of the coatings in the Building 2 - Final Finish Area are applied using spray coating, therefore the requirements of 326 IAC 6-3-2(d) are applicable when spray coating at this facility. When using spray coating, particulate from the Building 2 - Final Finish Area shall be controlled by a total enclosure, which constitutes an "equivalent control device" and satisfies 326 IAC 6-3-2(d).

(3) Some of the coatings in Building 3 - Frame Shop are applied using spray coating, therefore the requirements of 326 IAC 6-3-2(d) are applicable when spray coating at this facility. Particulate from Building 3 - Frame Shop shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-1(b)(5), (6), (7), and (8), all other coating at the source are not subject to the requirements of 326 IAC 6-3, since the surface coatings are applied using dip, roll, flow or brush coating.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
(1) The unlimited VOC potential emissions from the Building 1 - Floor Assembly Area are greater than twenty-five (25) tons per year. When surface coating wood furniture or

cabinets in the Building 1 - Floor Assembly Area , Building 1 - Floor Assembly Area is subject to 326 IAC 8-2-12. When performing surface coating in the Building 1 - Floor Assembly Area that is not subject to 326 IAC 8-2-12, the source shall limit the VOC input to the Building 1 - Floor Assembly Area to less than twenty-five (25) tons per year in order to render the requirements of 326 IAC 8-1-6 not applicable. In order to render the requirements of 326 IAC 8-1-6 not applicable to the Building 1 - Floor Assembly Area, the Permittee shall comply with the following when performing surface coating that is not subject to 326 IAC 8-2-12:

The VOC input (including dilution and cleaning solvents), other than used for wood furniture and cabinets, at the Building 1 - Floor Assembly Area, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the Building 1 - Floor Assembly Area to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 not applicable.

(2) The unlimited VOC potential emissions from each of the other units at the source are less than twenty-five (25) tons per year; therefore, each of these units are not subject to the requirements of 326 IAC 8-1-6.

(c) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)
The mobile homes manufactured by the source 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 surface coating units at this source are not subject to 326 IAC 8-2-2.

(d) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The surface coating units at this source are not subject to 326 IAC 8-2-9 because the type of metal surfaces coated are not listed in 326 8-2-9(a)(1).

(e) 326 IAC 8-2-10 (Flat Wood Panels; manufacturing operations)
The surface coating units at this source are not subject to 326 IAC 8-2-10 (Flat Wood Panels; manufacturing operations) because it does not manufacture or apply coatings to flat wood panels. It applies miscellaneous coatings and adhesives to wood construction materials, pre-finished wood cabinets, plastic, dryall, shingles, vinyl flooring and fiberglass parts.

(f) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This source is located in Elkhart County and consists of surface coating facilities that were each constructed after July 1, 1990 and that each have potential VOC emissions of greater than 15 pounds per day before add-on controls. Building 1 - Floor Assembly Area, Building 1 - Roof and Shell Area, and Building 2 - Final Finish Area coat wood furniture or cabinets. Therefore, the surface coating applied to wood furniture and cabinets at this source 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.

Woodworking Operation

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the woodworking operation, since it has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 9.49 pounds per hour when operating at a process weight rate of 3.5 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The woodworking operation can comply with 326 IAC 6-3-2 without the use of a control device.

Insignificant Activities

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(1) Pursuant to 326 IAC 6-3-1(b)(9), the Building 3 Welding stations are each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

(2) Pursuant to 326 IAC 6-3-1(b)(10), the Building 3 Torch Cutting stations are each exempt from the requirements of 326 IAC 6-3, because the maximum capacity of each torch cutting station is less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

(b) There are no 326 IAC State Rules that are applicable to the space heaters and air make-up units.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Building 3 - Frame Shop/ Dry Filters	Placement, Integrity, and Particle loading of the Dry Filters.	Once per Day
	Over Spray	Once per Week
	Stack Exhaust Observations	Once per Month

These monitoring conditions are necessary because the dry filters for the Building 3 - Frame Shop must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

(b) There are no testing requirements applicable to 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 March 20, 2013.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F039-32976-00611. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.

(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

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Uncontrolled Potential Emissions (ton/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	GHG as CO2e	Glycol Ethers	Total HAPs
Building 1 - Roof & Shell Area	0	0	0	0	0	19.7	0	0	3.85	5.33
Building 1 - Floor Assembly Area	159.3	159.3	159.3	0	0	42.6	0	0	0.06	1.96
Building 2 - Final Finish	10.8	10.8	10.8	0	0	9.21	0	0	0.11	1.91
Building 3 - Frame Shop	27.3	27.3	27.3	0	0	3.74	0	0	0	0
Woodworking	23.0	23.0	23.0	0	0	0	0	0	0	0
NG Combustion	0.11	0.43	0.43	0	5.59	0.31	4.70	6,712	0	0.11
LPG Combustion	0.06	0.20	0.20	0	3.73	0.29	2.15	3,672	0	0.00
Welding/Torch Cutting	10.3	10.3	10.3	0	0	0	0	0	0	0.04
Total	**230.9**	**231.3**	**231.3**	**0.0**	**9.3**	**75.8**	**6.9**	**10,384**	**4.0**	**9.3**

Limited Potential Emissions (ton/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	GHG as CO2e	Glycol Ethers	Total HAPs
Building 1 - Roof & Shell Area	0	0	0	0	0	19.7	0	0	3.8	5.3
Building 1 - Floor Assembly Area	159.3	38.7	38.7	0	0	42.6	0	0	0.06	1.96
Building 2 - Final Finish	10.8			0	0	9.21	0	0	0.11	1.91
Building 3 - Frame Shop	27.3	27.3	27.3	0	0	3.74	0	0	0	0.0
Woodworking	23.0	23.0	23.0	0	0	0	0	0	0	0
NG Combustion	0.11	0.43	0.43	0	5.59	0.31	4.70	6,712	0	0.11
LPG Combustion	0.06	0.20	0.20	0	3.73	0.29	2.15	3,672	0	0.0
Welding/Torch Cutting	10.3	10.3	10.3	0	0	0	0	0	0	0.04
Total	**230.9**	**99.9**	**99.9**	**0.0**	**9.3**	**75.8**	**6.9**	**10,384**	**4.0**	**9.3**

Appendix A: Emissions Calculations
VOC and PM Emissions from the Surface Coating Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Building Identification Material	Density (lbs/gal)	Total Weight % Volatile (water and organics)	Weight % Water	Weight % Organics	Weight % Solids	Estimated Actual Usage (gals/unit)	Maximum Usage (gals/unit)	Maximum Throughput (units/hr)	Maximum Usage (gals/day)	% of Total Usage in this Building	VOC Content (lbs/gal of coating)	Potential VOC (tons/yr)	PTE PM/PM10/PM2.5 (tons/yr)	Spray Application Method	Transfer Efficiency (%)	Control Efficiency (%)	Controlled Emissions (ton/yr)
Building 1 (Roof and Shell Area)																	
8125 Caulk - White & Clear	8.43	3.20%	0.00%	3.20%		0.03	0.05	1.0	1.08	50%	0.270	0.03	0.0	Manual	100%	0%	0
Foamseal Red Glue F6400-LVR	9.50	0.02%	0.00%	0.02%		1.57	2.36	1.0	56.52	100%	0.002	0.02	0.0	Manual	100%	0%	0
Alphaseal 5200 (as applied)	9.22	1.41%	0.00%	1.41%	98.59%	3.07	4.61	1.0	110.52	100%	0.130	2.62	0.0	Wand	100%	0%	0
C-111 Cyclo Brake & Parts Clean	6.46	70.10%	0.00%	70.10%		0.007	0.01	1.0	0.25	100%	4.528	0.21	0.0	Manual	100%	0%	0
Cyclo Break-Away Fast Penetrating Oil	7.46	25.00%	0.00%	25.00%		0.0001	0.0002	1.0	0.00	100%	1.865	0.00	0.0	Manual	100%	0%	0
1400 Floor Sealer	8.50	65.00%	0.00%	65.00%		0.09	0.14	1.0	3.24	100%	5.525	3.27	0.0	Manual	100%	0%	0
Pemco 5983	8.17	100.00%	0.00%	100.00%		0.14	0.21	1.0	5.04	100%	8.170	7.51	0.0	Manual	100%	0%	0
ColorFlex CF8001 & All Colors	13.76	0.70%	0.00%	0.70%		0.47	0.71	1.0	16.92	50%	0.096	0.15	0.0	Manual	100%	0%	0
Seamfil 901 White & All Colors	10.26	54.50%	11.50%	43.00%		0.0003	0.0005	1.0	0.01	50%	4.410	0.00	0.0	Manual	100%	0%	0
SF-99 Solvent	6.96	100.00%	0.00%	100.00%		0.001	0.002	1.0	0.04	50%	6.960	0.02	0.0	Manual	100%	0%	0
Pure Grade Lacquer Thinner	7.07	100.00%	0.00%	100.00%		0.04	0.06	1.0	1.44	50%	7.070	0.93	0.0	Manual	100%	0%	0
AHB Clear Thin Spread Adhesive	8.41	33.80%	0.00%	33.80%		0.05	0.08	1.0	1.80	100%	0.010	0.00	0.0	Manual	100%	0%	0
Universal Solvent Blend Coating	5.75	27.90%	0.00%	27.90%		0.001	0.001	1.0	0.03	10%	1.604	0.00	0.0	Manual	100%	0%	0
Matador White Conversion Topcoat (6631)	9.91	4.19%	0.00%	4.19%		0.0003	0.0005	1.0	0.01	10%	0.415	0.00	0.0	Manual	100%	0%	0
7211-8046 WB Matador White	9.75	56.85%	47.62%	9.23%		0.0003	0.0005	1.0	0.01	10%	0.900	0.00	0.0	Manual	100%	0%	0
Do It Mineral Spirits/Paint Thinner	6.52	100.00%	0.00%	100.00%		0.02	0.03	1.0	0.72	10%	6.520	0.09	0.0	Manual	100%	0%	0
Oatey Regular Clear PVC Solvent Cement	7.62	86.00%	0.00%	86.00%		0.06	0.09	1.0	2.16	90%	4.590	1.63	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Red	8.28	43.70%	0.00%	43.70%		0.006	0.01	1.0	0.22	34%	3.618	0.05	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Yellow	8.62	43.00%	0.00%	43.00%		0.006	0.01	1.0	0.22	34%	3.707	0.05	0.0	Manual	100%	0%	0
Geocel RP-400	7.93	26.40%	0.00%	26.40%		0.19	0.29	1.0	6.84	90%	2.094	2.35	0.0	Manual	100%	0%	0
Sta-Put SPM Aerosol Adhesive	7.26	30.00%	0.00%	30.00%		0.04	0.06	1.0	1.44	60%	3.290	0.52	0.0	Manual	100%	0%	0
Titebond II Premium Wood Glue	9.08	52.00%	0.00%	52.00%		0.0006	0.0009	1.0	0.02	90%	0.050	0.00	0.0	Manual	100%	0%	0
WD-40 Bulk Liquid	6.81	49.50%	0.00%	49.50%		0.03	0.05	1.0	1.08	34%	3.371	0.23	0.0	Manual	100%	0%	0
C-34 Cyclo White Grease	6.75	26.80%	0.00%	26.80%		0.0001	0.0002	1.0	0.00	50%	1.809	0.00	0.0	Manual	100%	0%	0
								Totals	**209.61**			**19.68**	**0.0**				**0.0**
Building 1 (Floor Assembly Area)																	
Kwik Seal Tub & Tile Adhesive Caulk	13.33	1.70%	1.10%	0.60%		0.001	0.002	1.0	0.05	50%	0.200	0.00	0.0	Manual	100%	0%	0
DAP Fireblock Foam Polyurethane Foam	10.00	20.00%	0.00%	20.00%		0.06	0.09	1.0	2.16	75%	2.000	0.59	0.0	Manual	100%	0%	0
Touch 'n Foam Insulating Sealant	10.00	0.00%	0.00%	0.00%		0.004	0.006	1.0	0.14	75%	0.000	0.00	0.0	Manual	100%	0%	0
SA-167 Siliconized Acrylic Latex Caulk	12.96	20.00%	17.38%	2.62%		0.05	0.08	1.0	1.80	60%	0.340	0.07	0.0	Manual	100%	0%	0
OSI F-38 Drywall and Panel Adhesive	11.58	0.25%	0.00%	0.25%		0.28	0.42	1.0	10.08	100%	0.029	0.05	0.0	Manual	100%	0%	0
Touch 'n Foam No-Warp Foam Sealant	8.41	13.60%	0.00%	13.60%		0.12	0.18	1.0	4.32	60%	1.144	0.54	0.0	Manual	100%	0%	0
Pure Grade Lacquer Thinner	7.07	100.00%	0.00%	100.00%		0.04	0.06	1.0	1.44	50%	7.070	0.93	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Red	8.28	43.70%	0.00%	43.70%		0.006	0.01	1.0	0.22	33%	3.618	0.05	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Yellow	8.62	43.00%	0.00%	43.00%		0.006	0.01	1.0	0.22	33%	3.707	0.05	0.0	Manual	100%	0%	0
Proform Topping (Ready Mix Joint Compound)	14.99	0.15%	0.00%	0.15%		7.970	11.96	1.0	286.92	90%	0.022	1.06	0.0	Manual	100%	0%	0
Cyclo Silicone Spray C-33	5.58	60.00%	0.00%	60.00%		0.0004	0.0006	1.0	0.01	50%	3.348	0.00	0.0	Manual	100%	0%	0
Sheetrock MH Speed-Tex Spray Mixture	13.33	32.50%	0.00%	32.50%	55.00%	5.15	7.73	1.0	185.40	100%	0.020	0.68	0.0	Air-Assist	100%	0%	0
Sta-Put SPM Aerosol Adhesive	7.26	30.00%	0.00%	30.00%		0.04	0.06	1.0	1.44	10%	3.290	0.09	0.0	Manual	100%	0%	0
7702 Vapor Barrier Paint	9.80	0.75%	0.00%	0.75%	50.00%	7.73	11.60	1.0	278.28	100%	0.074	3.73	62.2	Airless	75%	80%	12.4
Glidden Ultra-Hide 150 Eggshell	10.38	4.00%	0.00%	4.00%	45.00%	14.06	21.09	1.0	506.16	90%	0.415	34.52	97.1	Air-Assist	75%	80%	19.4
WD-40 Bulk Liquid	6.81	49.50%	0.00%	49.50%		0.03	0.05	1.0	1.08	33%	3.371	0.22	0.0	Manual	100%	0%	0.0
C-34 Cyclo White Grease	6.75	26.80%	0.00%	26.80%		0.0001	0.0002	1.0	0.00	50%	1.809	0.00	0.0	Manual	100%	0%	0.0
								Totals	**1279.72**			**42.58**	**159.3**				**31.9**

Appendix A: Emissions Calculations
VOC and PM Emissions from the Surface Coating Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Building Identification Material	Density (lbs/gal)	Total Weight % Volatile (water and organics)	Weight % Water	Weight % Organics	Weight % Solids	Estimated Actual Usage (gals/unit)	Maximum Usage (gals/unit)	Maximum Throughput (units/hr)	Maximum Usage (gals/day)	% of Total Usage in this Building	VOC Content (lbs/gal of coating)	Potential VOC (tons/yr)	PTE PM/PM10/PM2.5 (tons/yr)	Spray Application Method	Transfer Efficiency (%)	Control Efficiency (%)	Controlled Emissions (ton/yr)
Building 2 (Final Finish Area)																	
8125 Caulk - White & Clear	8.43	3.20%	0.00%	3.20%		0.03	0.05	1.0	1.08	50%	0.270	0.03	0.0	Manual	100%	0%	0
Corian Joint Adhesive (as applied)	10.41	4.00%	0.00%	4.00%		0.0002	0.0003	1.0	0.01	100%	0.416	0.00	0.0	Manual	100%	0%	0
Rust-Oleum Stops Rust Enamel Aerosol	6.98	0.00%	0.00%	0.00%		0.03	0.05	1.0	1.08	100%	0.000	0.00	0.0	Aerosol Can	40%	0%	0
Kwik Seal Tub & Tile Adhesive Caulk	13.33	1.70%	1.10%	0.60%		0.001	0.002	1.0	0.05	50%	0.200	0.00	0.0	Manual	100%	0%	0
Denatured Alcohol Solvent	6.57	100.00%	0.00%	100.00%		0.003	0.005	1.0	0.11	100%	6.570	0.13	0.0	Manual	100%	0%	0
DAP Fireblock Foam Polyurethane Foam	10.00	20.00%	0.00%	20.00%		0.06	0.09	1.0	2.16	25%	2.000	0.20	0.0	Manual	100%	0%	0
Windex Powered Glass Cleaner	8.30	100.00%	54.20%	45.80%		0.03	0.05	1.0	1.08	100%	3.801	0.75	0.0	Manual	100%	0%	0
Touch 'n Foam Insulating Sealant	10.00	0.00%	0.00%	0.00%		0.004	0.006	1.0	0.14	25%	0.000	0.00	0.0	Manual	100%	0%	0
SA-167 Siliconized Acrylic Latex Caulk	12.96	20.00%	17.38%	2.62%		0.05	0.08	1.0	1.80	40%	0.340	0.04	0.0	Manual	100%	0%	0
Touch 'n Foam No-Warp Foam Sealant	8.41	13.60%	0.00%	13.60%		0.12	0.18	1.0	4.32	40%	1.144	0.36	0.0	Manual	100%	0%	0
ColorFlex CF8001 & All Colors	13.76	0.70%	0.00%	0.70%		0.47	0.71	1.0	16.92	50%	0.096	0.15	0.0	Manual	100%	0%	0
Seamfil 901 White & All Colors	10.26	54.50%	11.50%	43.00%		0.0003	0.0005	1.0	0.01	50%	4.410	0.00	0.0	Manual	100%	0%	0
SF-99 Solvent	6.96	100.00%	0.00%	100.00%		0.001	0.002	1.0	0.04	50%	6.960	0.02	0.0	Manual	100%	0%	0
Universal Solvent Blend Coating	5.75	27.90%	0.00%	27.90%		0.001	0.001	1.0	0.03	90%	1.604	0.01	0.0	Manual	100%	0%	0
Matador White Conversion Topcoat (6631)	9.91	4.19%	0.00%	4.19%		0.0003	0.0005	1.0	0.01	90%	0.415	0.00	0.0	Manual	100%	0%	0
7211-8046 WB Matador White	9.75	56.85%	47.62%	9.23%		0.0003	0.0005	1.0	0.01	90%	0.900	0.00	0.0	Manual	100%	0%	0
Do It Mineral Spirits/Paint Thinner	6.52	100.00%	0.00%	100.00%		0.02	0.03	1.0	0.72	90%	6.520	0.77	0.0	Manual	100%	0%	0
Oatey Regular Clear PVC Solvent Cement	7.62	86.00%	0.00%	86.00%		0.06	0.09	1.0	2.16	10%	4.590	0.18	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Red	8.28	43.70%	0.00%	43.70%		0.006	0.01	1.0	0.22	33%	3.618	0.05	0.0	Manual	100%	0%	0
Industrial Enamel, Safety Yellow	8.62	43.00%	0.00%	43.00%		0.006	0.01	1.0	0.22	33%	3.707	0.05	0.0	Manual	100%	0%	0
Proform Topping (Ready Mix Joint Compound)	14.99	0.15%	0.00%	0.15%		7.970	11.96	1.0	286.92	10%	0.022	0.12	0.0	Manual	100%	0%	0
Geocel RP-400	7.93	26.40%	0.00%	26.40%		0.19	0.29	1.0	6.84	10%	2.094	0.26	0.0	Manual	100%	0%	0
Cyclo Silicone Spray C-33	5.58	60.00%	0.00%	60.00%		0.0004	0.0006	1.0	0.01	50%	3.348	0.00	0.0	Manual	100%	0%	0
Touch 'n Tone Aerosol Topcoats - Black	5.94	54.26%	0.00%	54.26%		0.0300	0.0450	1.0	1.08	100%	3.223	0.64	0.0	Manual	100%	0%	0
Touch 'n Tone Aerosol Topcoats - White	5.94	54.26%	0.00%	54.26%		0.0300	0.0450	1.0	1.08	100%	3.223	0.64	0.0	Manual	100%	0%	0
Sta-Put SPM Aerosol Adhesive	7.26	30.00%	0.00%	30.00%		0.04	0.06	1.0	1.44	30%	3.290	0.26	0.0	Manual	100%	0%	0
Titebond II Premium Wood Glue	9.08	52.00%	0.00%	52.00%		0.0006	0.0009	1.0	0.02	10%	0.050	0.00	0.0	Manual	100%	0%	0
Glidden Ultra-Hide 150 Eggshell	10.38	4.00%	0.00%	4.00%	45.00%	14.06	21.09	1.0	506.16	10%	0.415	3.84	10.8	Air-Assist	75%	80%	2.2
Valspar Z-Form Conversion Varnish	7.59	100.00%	0.00%	100.00%		0.01	0.02	1.0	0.36	100%	7.590	0.50	0.0	Manual	100%	0%	0
WD-40 Bulk Liquid	6.81	49.50%	0.00%	49.50%		0.03	0.05	1.0	1.08	33%	3.371	0.22	0.0	Manual	100%	0%	0
								Totals	**837.15**			**9.21**	**10.8**				**2.2**

Notes:
Some of the surface coating products can be used in either Building 1 (both areas) or Building 2. The % breakdown of usage between different locations is identified.
Alphaseal 5200 (as applied) is a mixture of Alphaseal 5200A and Alphaseal 5200B at a ratio of 1:1. This product is gently applied with a wand with no overspray emissions at all, so the transfer eff is assumed to be 100%.
Corian Joint Adhesive (as applied) is a mixture of Corian Joint Adhesive, Parts A & B.
Sheetrock Spray Mixture is spray applied. However, the process of applying ceiling texture to wallboard generates no overspray because the material is a paste-like substance. Therefore, the transfer eff is assumed to be 100%.
7702 Vapor Barrier Paint & Glidden Ultra-Hide 150 Eggshell paint are spray applied. However, these coatings are spray applied inside constructed modular/mobile homes to coat the interior walls & ceilings as the very last step of the assembly process. There are no overspray emissions that can exit the homes through openings. Therefore, the transfer efficiency is assumed to be 100%.
Density, Weight % Volatile, Weight % Water, Weight % Organics, Weight % Solids, VOC Content (if available) values obtained directly from MSDSs, VOC Data Sheets, or other documentation provided by the coating manufacturers.
Otherwise, the VOC Content is derived by multiplying the density (lb/gal) by the Weight % Organics.
Estimated Actual Usage is based upon the average monthly amount of each coating material expected to be used based upon similar operations at another manufactured housing facility and a processing rate of 160 units/month (which in turn is based upon a maximum of 1 unit per hour per 8-hour shift). The typical operating schedule of the facility will be 8 hours/day, 5 days/week, 4 weeks/month.
Manual application methods (non-atomizing) include wiping, rolling, brushing, troweling, or extruding, or hand-held cauking gun. As modular homes present a large and flat target, a transfer eff. of 100% is assumed for all manual application methods.
There are no VOC or PM emission controls used with these surface coating operations.

Methodology:
Maximum Usage (gals/unit) = Estimated Actual Usage (gals/unit) x 1.5 Safety Factor
Pounds of VOC per Gallon Coating = Density (lbs/gal) x Weight % Organics
Potential VOC (tons/yr) = Pounds of VOC per Gallon Coating (lbs/gal) x Maximum Usage (gals/unit) x Maximum Throughput (units/hr) x (% Total Usage in this Building) x 8760 hours/year x 1 ton/2000 lbs
Potential PM/PM10/PM2.5 (tons/yr) = Density (lbs/gal) x Maximum Usage (gals/unit) x Maximum Throughput (units/hr) x (% Total Usage in this Building) x (Weight % Solids) x (1 - Transfer Efficiency %) x 8760 hours/year x 1 ton/2000 lbs

Appendix A: Emissions Calculations
HAP Emissions from the Surface Coating Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Building Identification Material	Density (lbs/gal)	Maximum Usage (gals/hr)	% of Total Usage in this Building	Weight % Ethylbenzene	Weight % MDI	Weight % Ethylene Glycol	Weight % Vinyl Acetate	Weight % MIBK	Weight % Toluene	Weight% Hexyloxy ethanol	Weight % Xylene	Weight % Methanol	Weight % Vinyl Chloride	Weight % Methylene Chloride	Weight % MMA	Weight % Glycol Ethers	Potential Ethylbenzene (tons/yr)	Potential MDI (tons/yr)	Potential Ethylene Glycol (tons/yr)	Potential Vinyl Acetate (tons/yr)	Potential MIBK (tons/yr)	Potential Toluene (tons/yr)	Potential Hexyloxy ethanol (tons/yr)	Potential Xylene (tons/yr)	Potential Methanol (tons/yr)	Potential Vinyl Chloride (tons/yr)	Potential Methylene Chloride (tons/yr)	Potential MMA (tons/yr)	Potential Glycol Ethers (tons/yr)	**Total HAPs (tons/yr)**
Building 1 (Roof and Shell Area)																														
8125 Caulk - White & Clear	8.43	0.05	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Foamseal Red Glue F6400-LVR	9.50	2.36	100%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	4.91E-05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Alphaseal 5200 (as applied)	9.22	4.61	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
C-111 Cyclo Brake & Parts Clean	6.46	0.01	100%	0.00%	0.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.11**
Cyclo Break-Away Fast Penetrating Oil	7.46	0.0002	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
1400 Floor Sealer	8.50	0.14	100%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	**0.01**
Pemco 5983	8.17	0.21	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.76	**3.76**
ColorFlex CF8001 & All Colors	13.76	0.71	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Seamfil 901 White & All Colors	10.26	0.0005	50%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
SF-99 Solvent	6.96	0.002	50%	0.00%	0.00%	0.00%	0.00%	5.00%	47.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.002	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.02**
Pure Grade Lacquer Thinner	7.07	0.06	50%	0.00%	0.00%	0.00%	0.00%	0.00%	66.28%	0.00%	5.59%	9.38%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.62	0.00	0.05	0.09	0.00	0.00	0.00	0.00	**0.75**
AHB Clear Thin Spread Adhesive	8.41	0.08	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.98%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	**0.09**
Universal Solvent Blend Coating	5.75	0.001	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Matador White Conversion Topcoat (6631)	9.91	0.0005	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
7211-8046 WB Matador White	9.75	0.0005	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.50%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Do It Mineral Spirits/Paint Thinner	6.52	0.03	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Oatey Regular Clear PVC Solvent Cement	7.62	0.09	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Industrial Enamel, Safety Red	8.28	0.01	34%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Industrial Enamel, Safety Yellow	8.62	0.01	34%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Geocel RP-400	7.93	0.29	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sta-Put SPM Aerosol Adhesive	7.26	0.06	60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.10%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58	0.00	**0.58**
Titebond II Premium Wood Glue	9.08	0.0009	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
WD-40 Bulk Liquid	6.81	0.05	34%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
C-34 Cyclo White Grease	6.75	0.0002	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
																Totals	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.74**	**0.00**	**0.05**	**0.09**	**0.01**	**0.58**	**0.00**	**3.85**	**5.33**
Building 1 (Floor Assembly Area)																														
Kwik Seal Tub & Tile Adhesive Caulk	13.33	0.002	50%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
DAP Fireblock Foam Polyurethane Foam	10.00	0.09	75%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.48E-06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Touch 'n Foam Insulating Sealant	10.00	0.006	75%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	9.86E-08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
SA-167 Siliconized Acrylic Latex Caulk	12.96	0.08	60%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	**0.11**
OSI F-38 Drywall and Panel Adhesive	11.58	0.42	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Touch 'n Foam No-Warp Foam Sealant	8.41	0.18	60%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.99E-06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Pure Grade Lacquer Thinner	7.07	0.06	50%	0.00%	0.00%	0.00%	0.00%	0.00%	66.28%	0.00%	5.59%	9.38%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.62	0.00	0.05	0.09	0.00	0.00	0.00	0.00	**0.75**
Industrial Enamel, Safety Red	8.28	0.01	33%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Industrial Enamel, Safety Yellow	8.62	0.01	33%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Proform Topping (Ready Mix Joint Compound)	14.99	11.96	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Cyclo Silicone Spray C-33	5.58	0.0006	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sheetrock MH Speed-Tex Spray Mixture	13.33	7.73	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sta-Put SPM Aerosol Adhesive	7.26	0.06	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.10%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	**0.10**
7702 Vapor Barrier Paint	9.80	11.60	100%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.50	0.00	0.00	0.00	**1.00**
Glidden Ultra-Hide 150 Eggshell	10.38	21.09	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
WD-40 Bulk Liquid	6.81	0.05	33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
C-34 Cyclo White Grease	6.75	0.0002	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
																Totals	**0.00**	**0.00**	**0.06**	**0.50**	**0.00**	**0.62**	**0.00**	**0.05**	**0.09**	**0.50**	**0.10**	**0.00**	**0.06**	**1.96**

Appendix A: Emissions Calculations
HAP Emissions from the Surface Coating Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Building Identification Material	Density (lbs/gal)	Maximum Usage (gals/hr)	% of Total Usage in this Building	Weight % Ethylbenzene	Weight % MDI	Weight % Ethylene Glycol	Weight % Vinyl Acetate	Weight % MIBK	Weight % Toluene	Weight% Hexyloxy ethanol	Weight % Xylene	Weight % Methanol	Weight % Vinyl Chloride	Weight % Methylene Chloride	Weight % MMA	Weight % Glycol Ethers	Potential Ethylbenzene (tons/yr)	Potential MDI (tons/yr)	Potential Ethylene Glycol (tons/yr)	Potential Vinyl Acetate (tons/yr)	Potential MIBK (tons/yr)	Potential Toluene (tons/yr)	Potential Hexyloxy ethanol (tons/yr)	Potential Xylene (tons/yr)	Potential Methanol (tons/yr)	Potential Vinyl Chloride (tons/yr)	Potential Methylene Chloride (tons/yr)	Potential MMA (tons/yr)	Potential Glycol Ethers (tons/yr)	**Total HAPs (tons/yr)**
Building 2 (Final Finish Area)																														
8125 Caulk - White & Clear	8.43	0.05	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Rust-Oleum Stops Rust Enamel Aerosol	6.98	0.05	100%	10.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.15	0.00	0.00	0.00	0.00	0.38	0.00	0.38	0.00	0.00	0.00	0.00	0.08	**0.99**
Corian Joint Adhesive (as applied)	10.41	0.0003	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	55.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	**0.01**
Kwik Seal Tub & Tile Adhesive Caulk	13.33	0.002	50%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Denatured Alcohol Solvent	6.57	0.005	100%	0.00%	0.00%	0.00%	0.90%	0.00%	0.00%	0.00%	0.00%	52.30%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	**0.08**
DAP Fireblock Foam Polyurethane Foam	10.00	0.09	25%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	4.93E-07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Windex Powered Glass Cleaner	8.30	0.05	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	**0.03**
Touch 'n Foam Insulating Sealant	10.00	0.006	25%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.29E-08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
SA-167 Siliconized Acrylic Latex Caulk	12.96	0.08	40%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	**0.07**
Touch 'n Foam No-Warp Foam Sealant	8.41	0.18	40%	0.00%	5.00E-07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.33E-06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
ColorFlex CF8001 & All Colors	13.76	0.71	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Seamfil 901 White & All Colors	10.26	0.0005	50%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
SF-99 Solvent	6.96	0.002	50%	0.00%	0.00%	0.00%	0.00%	5.00%	47.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.02**
Universal Solvent Blend Coating	5.75	0.001	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Matador White Conversion Topcoat (6631)	9.91	0.0005	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
7211-8046 WB Matador White	9.75	0.0005	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.50%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Do It Mineral Spirits/Paint Thinner	6.52	0.03	90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Oatey Regular Clear PVC Solvent Cement	7.62	0.09	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Industrial Enamel, Safety Red	8.28	0.01	33%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Industrial Enamel, Safety Yellow	8.62	0.01	33%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Proform Topping (Ready Mix Joint Compound)	14.99	11.96	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Geocel RP-400	7.93	0.29	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Cyclo Silicone Spray C-33	5.58	0.0006	50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Touch 'n Tone Aerosol Topcoats - Black	5.94	0.0450	100%	0.00%	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.14**
Touch 'n Tone Aerosol Topcoats - White	5.94	0.0450	100%	0.00%	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.14**
Sta-Put SPM Aerosol Adhesive	7.26	0.06	30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.10%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.29	0.00	**0.29**
Titebond II Premium Wood Glue	9.08	0.0009	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Glidden Ultra-Hide 150 Eggshell	10.38	21.09	10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Valspar Z-Form Conversion Varnish	7.59	0.02	100%	1.00%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00	0.10	0.00	0.03	0.00	0.00	0.00	0.00	0.00	**0.14**
WD-40 Bulk Liquid	6.81	0.05	33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
															Totals		**0.16**	**0.00**	**0.04**	**0.00**	**0.00**	**0.78**	**0.03**	**0.42**	**0.08**	**0.00**	**0.29**	**0.01**	**0.11**	**1.91**

Notes:
Some of the surface coating products can be used in either Building 1 (both areas) or Building 2. The % breakdown of usage between different locations is identified.
Alphaseal 5200 (as applied) is a mixture of Alphaseal 5200A and Alphaseal 5200B at a ratio of 1:1.
Corian Joint Adhesive (as applied) is a mixture of Corian Joint Adhesive, Parts A & B.
Density and Weight % HAP values obtained directly from MSDSs.
Maximum Usage (gals/hr) values obtained from the PM and VOC Emissions from Surface Coating Operations spreadsheet and are based upon the Maximum Usage (gals/unit) x Maximum Throughput (units/hr).
Methylene Bisphenyl Isocyanate (MDI) flash-off emissions from the Foamseal Red Glue F6400-LVR, DAP Fireblock Foam, Touch 'n Foam Insultating Sealant, and Touch 'n Foam No-Warp Sealant products are based upon the "MDI Emissions Reporting Guidelines", published by the Society of the Plastic Industry.
The MDI emission factor is less than 5e-07 lb/lb-Each Foam Product, which is based upon a maximum MDI content of 50%.
There are no HAP emission controls used with these surface coating operations.

Methodology:
Potential HAPS (tons/yr) = Density (lbs/gal) x Maximum Usage (gals/hr) x Weight % HAP (or alternative EF for foam sealant products) x (% of Total Usage in this Building) x 8760 hours/year x 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and HAP Emissions from the Surface Coating Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Building Identification Material	Density (lbs/gal)	Total Weight % Volatile (water and organics)	Weight % Water	Weight % Organics	Weight % Solids	Estimated Actual Usage (gals/unit)	Maximum Usage (gals/unit)	Maximum Throughput (units/hr)	Maximum Usage (gals/day)	VOC Content (lbs/gal of coating)	Potential VOC (tons/yr)	Potential PM/PM10/PM2.5 (tons/yr)	Spray Application Method	Transfer Efficiency (%)	Control Efficiency (%)	Controlled Potential PM/PM10/PM2.5 (tons/year)
Building 3 (Frame Shop)																
Reynco 6437 WP Paint	8.80	0.55%	0.00%	0.55%	21.00%	4.50	6.75	2.0	324.00	0.048	2.86	27.32	Airless	75%	80%	5.46
Citrasol Cleaning Solvent	7.02	47.50%	0.00%	47.50%	0.00%	0.02	0.03	2.0	1.44	3.335	0.88	0.00	Manual	100%	0%	0.00
								Totals	**325.44**		**3.74**	**27.32**				**5.46**

Notes:
Reynco 6437 WP Paint is spray applied in two paint rooms using airless spray guns (2) with an assumed transfer efficiency of 75%.
Citrasol Cleaning Solvent is manually applied to clean around the spray guns. Manual application includes hand wiping.
Density, Weight % Volatile, Weight % Water, Weight % Organics, Weight % Solids, and VOC Content (if available) values obtained directly from MSDSs, VOC Data Sheets, or other documentation provided by the coating manufacturers.
Estimated Actual Usage is based upon the expected monthly amount of each coating material to be used based upon facility specifications.
The transfer eff. for the spray guns used with the identified coating derived based upon the values approved by IDEM for similar guns as part of MSOP #M039-28343-00611 issued on 11/18/09 for the former Forest River Housing facility at this same address in Wakarusa.
The control efficiency for the dry filters controlling the two paint rooms is conservatively estimated to be 80%.
There are no HAP components in either of these surface coating products.

Methodology:
Maximum Usage (gals/unit) = Estimated Actual Usage (gals/unit) x 1.5 Safety Factor
Pounds of VOC per Gallon Coating = Density (lbs/gal) x Weight % Organics
Potential VOC (tons/yr) = Pounds of VOC per Gallon Coating (lbs/gal) x Maximum Usage (gals/unit) x Maximum Throughput (units/hr) x 8760 hours/year x 1 ton/2000 lbs
Potential PM/PM10/PM2.5 (tons/yr) = Density (lbs/gal) x Maximum Usage (gals/unit) x Maximum Throughput (units/hr) x (Weight % Solids) x (1 - Transfer Efficiency %) x 8760 hours/year x 1 ton/2000 lbs
Controlled PM/PM10/PM2.5 (tons/yr) = Potential PM/PM10/PM2.5 (tons/yr) x (1 - Control Efficiency %)

Appendix A: Emissions Calculations
Emissions from the Woodworking Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

						Determination of Whether Controls Required		
Emissions Unit	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Actual Quantity of Dust Collected (lbs/mo)	Maximum Quantity of Dust Collected (lbs/hr)	Potential PM/PM10/PM2.5 (tons/yr)	Process Throughput (tons/hr)	State Maximum Allowable PM Emissions (lbs/hr)	Maximum Actual Uncontrolled PM Emissions (lbs/hr)
Woodworking - Existing Buildings 1 & 2	7,000	3.50	876	5.26	23.02	3.50	9.49	5.26

Notes:
Assume all PM emissions are equal to PM10/PM2.5.

The woodworking operations consist of miscellaneous chop tables, saws, and routers located in Plants 1 and 2. These processes are uncontrolled and exhaust inside the building.
The Maximum Throughput is the combination of all individual woodworking emission units.
There are no woodworking operations in the new Building 3.
Most lumber comes in pre-cut. The only cutting comes from odd-sized floors and making small cuts in units. Therefore, only a minor quantity of sawdust is generated.
The Actual Quantity of Dust Collected was calculated by collecting the dust generated with a portable vacuum and measuring.

Methodology:
Max Quantity of Dust Generated (lbs/hr)= Actual Quantity of Dust Collected (lbs/mo) x 12 mo/yr / (2000 hr operation time per year)
Potential PM/PM10/PM2.5 (tons/yr)= Maximum Quantity of Dust Collected (lbs/hr) X (8760 hrs/yr) X (1 ton/2000 lbs)

State Maximum Allowable PM Emissions (lbs/hr) = 4.10 x Process Throughput (tons/hr) ^ 0.67
Maximum Actual Uncontrolled PM Emissions (lbs/hr) = Potential PM/PM10/PM2.5 (tons/yr) x (2000 lbs/ton) x (1 yr/8760 hrs)
Since the Max Actual Uncontrolled PM Emissions are less than the State Max Allowable PM Emissions, the woodworking operation is in compliance with 326 IAC 6-3 without the use of any control devices.

Appendix A: Emission Calculations
Combustion Emissions - Gas-Fired Space Heaters and Air Make-up Units

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Units	Total Heat Input Capacity MMBtu/hr
Building 1 & 2 NG units	7.17
Building 3 NG units	5.60
Total	**12.77**

Potential Throughput (MMCF/yr)
111.9

	Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	PM2.5* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.1	0.4	0.4	0.0	5.6	0.3	4.7

*PM10/PM2.5 emission factor is filterable and condensable PM10/PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100

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/1,000 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

	HAPs - Organics				
	Benzene	Dichloroben zene	Formaldehyd e	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.2E-04	6.7E-05	4.2E-03	1.0E-01	1.9E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.8E-05	6.2E-05	7.8E-05	2.1E-05	1.2E-04

Methodology is the same as above. **Total HAPs:** **1.1E-01**

Notes:
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	6711.91	0.13	0.12
Summed Potential Emissions in tons/yr	6712.2		

Notes:
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.

Methodology:
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
LPG-Propane - Heaters

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

Heat Input Capacity MMBtu/hr: 6.0

Potential Throughput kgals/year: 574.43

SO2 Emission factor = 0.10 x S
S = Sulfur Content = 0.54 grains/100ft^3

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.1 *(0.10S)*	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.06	0.20	0.20	0.02	3.73	0.29	2.15

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu
Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Propane Emission Factors shown. Please see AP-42 for butane.
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emission in tons/yr	3,590	0.06	0.26
Summed Potential Emissions in tons/yr	3,590		
CO2e Total in tons/yr	3,672		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.
Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Emissions from Welding Operations

Source Name: CMH Manufacturing West Plant #995
Source Location: 66700 State Road 19, Wakarusa, IN 46573
Permit Number: F039-32976-00611
Permit Reviewer: Heath Hartley

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	EMISSION FACTORS (lb pollutant/lb electrode)				Potential to Emit (ton/yr)				
WELDING				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	Total HAPs
Metal Inert Gas (MIG)(carbon steel) - Existing Buildings 1 & 2	1	0.04	0.96	0.024	0.000034	NA	0.00001	0.004	0.00001	0	0.00000	0.000
Metal Inert Gas (MIG)(carbon steel) - New Building 3	8	4.00	96	0.024	0.000034	NA	0.00001	3.38	0.00477	0	0.00140	0.006

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./min)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				Potential to Emit (ton/yr)				
				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	Total HAPs
Oxyacetylene Torches - Existing Buildings 1 & 2	2	8.0	5.0	0.162	0.0005	0.0001	0.0003	3.41	0.011	0.002	0.006	0.019
Oxyacetylene Torches - New Building 3	2	8.0	5.0	0.162	0.0005	0.0001	0.0003	3.41	0.011	0.002	0.006	0.019
Plasma Cutters - New Building 3**	2	8.0	4.0	0.0039	0	0	0	0.07	0	0	0	0.000
							Totals	**10.27**	**0.03**	**0.004**	**0.014**	**0.04**

Notes:
MIG welding emission factors are from AP 42, Chapter 12-19, Tables 12-19.1 and 12-19.2 (SCC 3-09-052-26) January 1995.
MIG welding emissions include all MIG units, projection welders, and seam welders.

Methodology:
PTE (tons/year) = Number of Stations x Electrode Consumption (lbs/hour) x Emission Factor (lbs /lb electrode) x 8760 (hours/year) x 1 ton/2,000 lbs
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. c
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,00(

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dave McCann
General Manager
CMH Manufacturing West Plant #995
66700 SR 19
Wakarusa, Indiana 46573

DATE: June 4, 2013

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

SUBJECT: Final Decision
New Source Review and FESOP
039-32976-00611

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:
Joseph VanCamp / IDI Fabrication
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.

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June 4, 2013

TO: Wakarusa Public Library

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

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

Applicant Name: **CMH Manufacturing West Plant #995**
Permit Number: **039-32976-00611**

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	AWELLS 6/4/2013 CMH Manufacturing West Plant #995 039-32976-00611 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		Dave McCann GM CMH Manufacturing West Plant #995 66700 SR 19 Wakarusa IN 46573 (RO CAATS) confirmed delivery									
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
3		Wakarusa Town Council and Town Manager P.O. Box 474 Wakarusa IN 46573 *(Local Official)*									
4		Wakarusa-Olive and Harrison Township 124 N Elkhart St. Box 485 Wakarusa IN 46573-0485 *(Library)*									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
6		Mr. Joseph VanCamp IDI Fabrication 312 East Diamond Street Kendallville IN 46755 *(Consultant)*									
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