



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Jayco, Inc. - Topeka in LaGrange County

Significant Permit Revision No.: 087-36627-00007

The Indiana Department of Environmental Management (IDEM) has received an application from Jayco, Inc. - Topeka, located at 536 Michigan Street, Topeka, Indiana 46571, for a significant revision of its FESOP issued on July 25, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Jayco, Inc. - Topeka to make certain changes at its existing source. Jayco, Inc. - Topeka has applied to construct of a new recreational vehicle assembly line, two (2) lamination operations, and new natural gas fueled space heating equipment, modify the method of operation of existing RV assembly processes and woodworking, and replace woodworking dust collectors.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Topeka Public Library
133 N. Main St.
Topeka, IN 46571

and

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

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

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 087-36627-00007 in all correspondence.

Comments should be sent to:

Doug Logan
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5328
Or dial directly: (317) 234-5328
Fax: (317) 232-6749 attn: Doug Logan
E-mail: dlogan@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Doug Logan or my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



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Mr. Ted Buchanan
Jayco, Inc.
903 South Main Street
Middlebury, Indiana 46540

Re: 087-36627-00007
Significant Revision to
F087-30645-00007

Dear Mr. Buchanan:

Jayco, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F087-30645-00007 on July 25, 2012 for a stationary travel trailer and camper manufacturing operation located at 536 Michigan Street, Topeka, Indiana 46571. On December 16, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to construct of a new recreational vehicle assembly line, two (2) lamination operations, and new natural gas fueled space heating equipment, modify the method of operation of existing RV assembly processes and woodworking, and replace woodworking dust collectors. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

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All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised, including the following revised attachment:

Attachment A: Reserved

The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment B: 40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Doug Logan of my staff at 317-234-5328 or 1-800-451-6027, and ask for extension 4-5328.

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA/dal

cc: File - LaGrange County
LaGrange County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**Jayco Inc. - Topeka
536 W. Michigan Street
Topeka, Indiana 46571**

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

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

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

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

Operation Permit No.: F087-30645-00007	
Issued by: Original Signed Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: July 25, 2012 Expiration Date: July 25, 2022

Significant Permit Revision No.: 087-36627-00007	
Issued by: Jenny Acker, Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 25, 2022



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Attachment A: Reserved

**Attachment B: National Emission Standards for Hazardous Air Pollutants for Source Category:
Gasoline Dispensing Facilities [40 CFR 63, Subpart CCCCC]**

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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 travel trailer and camper manufacturing operation.

Source Address:	536 W. Michigan Street, Topeka, Indiana 46571
General Source Phone Number:	574-825-0564
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) dip stain coating operation, identified as DS1, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 9.5 units per hour, using dip, roller, and wipe application methods, with no VOC controls and exhausting indoors.
- (b) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, consisting of:
 - (1) One (1) recreational vehicle assembly operation, identified as Line 54, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 4.25 units per hour, using no controls, and exhausting indoors.
 - (2) One (1) recreational vehicle assembly operation, identified as Line 57, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.00 units per hour, using no controls, and exhausting indoors.
 - (3) One (1) recreational vehicle assembly operation, identified as Line 58, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.75 units per hour, using no controls, and exhausting indoors.
- (c) One (1) touchup booth, identified as SB1, constructed in 2003, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB1.
- (d) One (1) touchup booth, identified as SB2, constructed in 1999, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB2.
- (e) Four (4) woodworking shops, described as follows:

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- (1) Shop 1, identified as DC1, constructed in 1964 and modified in 2011, with a maximum capacity of 3,130 pounds of wood per hour, equipped with an integral 11499 ACFM external return air cyclone and bag filter system and exhausting back inside the source.
- (2) Shop 2, identified as DC2, constructed in 1968, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
- (3) Shop 3, identified as DC3, constructed in 1988, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
- (4) Shop 4, identified as DC4, constructed in 2001, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
- (f) One (1) recreational vehicle assembly operation, identified as Line 49, approved in 2016 for construction, with a maximum capacity of 0.50 units per hour, using no controls, and exhausting indoors.
- (g) One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 1, approved in 2016 for construction, with a maximum capacity of 4.25 panels per hour, using no controls and exhausting to stack L1SV1.
- (h) One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 2, approved in 2016 for construction, with a maximum capacity of 8.00 panels per hour, using no controls and exhausting to stack L2SV1.

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) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: woodworking and machining operations separate from Woodworking Shops 1 through 4, DC1 through DC4.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Various heating units.
 - (2) One (1) natural gas-fired air make-up unit, identified as AM-1, permitted in 2000, with a maximum heat input capacity of 4.90 MMBtu/hr, exhausting to stack HSV1.
 - (3) One (1) natural gas-fired air make-up unit, identified as AM-2, permitted in 2000, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV2.
 - (4) One (1) natural gas-fired air make-up units, identified as AM-3, permitted in 2003, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV3.

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- (5) Six (6) natural gas-fired thermo cyclers heaters, identified as H-33, H-34, H-35, H-36, H-37, and H-38, permitted in 2000, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting to stacks HSV4 - HSV9.
 - (6) One (1) natural gas-fired thermo cyclers heater, identified as H-43, permitted in 2016, with a maximum heat input capacity of 0.50 MMBtu/hr, exhausting to stack HSV10.
 - (7) One (1) natural gas-fired thermo cyclers heater, identified as H-44, permitted in 2012, with a maximum heat input capacity of 0.40 MMBtu/hr, exhausting to stack HSV11.
 - (8) Two (2) natural gas fueled Thermo-Cyclers, identified as H-79-1 and H-79-2, permitted in 2016, with a maximum heat input capacity of 0.58 MMBtu/hr, each, using no controls, and exhausting to stack HSV12 and HSV13, respectively.
 - (9) One (1) natural gas fueled office furnace, identified as H-79-3, permitted in 2016, with a maximum heat input capacity of 0.093 MMBtu/hr, using no controls, and exhausting to stack HSV14.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- Under 40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities the gasoline fuel transfer and dispensing operation is an affected facility.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (h) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM: Wash bay with spray wand for washing RV units, using water and detergent.

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

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

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SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, F087-30645-00007, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

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(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F087-30645-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

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(3) deleted.

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

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

(1) That this permit contains a material mistake.

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

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

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

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). 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

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Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(b)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

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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), 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.

(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,

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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.

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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).

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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, where applicable:
- (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, where applicable:
- (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

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- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) dip stain coating operation, identified as DS1, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 9.5 units per hour, using dip, roller, and wipe application methods, with no VOC controls and exhausting indoors.
- (b) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, consisting of:
 - (1) One (1) recreational vehicle assembly operation, identified as Line 54, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 4.25 units per hour, using no controls, and exhausting indoors.
 - (2) One (1) recreational vehicle assembly operation, identified as Line 57, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.00 units per hour, using no controls, and exhausting indoors.
 - (3) One (1) recreational vehicle assembly operation, identified as Line 58, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.75 units per hour, using no controls, and exhausting indoors.
- (c) One (1) touchup booth, identified as SB1, constructed in 2003, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB1.
- (d) One (1) touchup booth, identified as SB2, constructed in 1999, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB2.
- (f) One (1) recreational vehicle assembly operation, identified as Line 49, approved in 2016 for construction, with a maximum capacity of 0.50 units per hour, using no controls, and exhausting indoors.
- (g) One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 1, approved in 2016 for construction, with a maximum capacity of 4.25 panels per hour, using no controls and exhausting to stack L1SV1.
- (h) One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 2, approved in 2016 for construction, with a maximum capacity of 8.00 panels per hour, using no controls and exhausting to stack L2SV1.

(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 Limitations (VOC) [326 IAC 2-8]

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

- (a) The total VOC input to the emissions units listed in the table below shall not exceed ninety four and sixty-seven hundredths (94.67) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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Emissions Unit
Dip stain coating DS1
Line 54
Line 57
Line 58
Touchup Booth SB1
Touchup Booth SB2
Line 49
Lamination

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

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any 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 [326 IAC 2-8-4(1)]

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

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

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1. 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.

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

D.1.5 Reporting Requirements

A quarterly report of total VOC input and a summary of the information to document the

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compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (g) Four (4) woodworking shops, described as follows:
- (1) Shop 1, identified as DC1, constructed in 1964, and modified in 2011, with a maximum capacity of 3,130 pounds of wood per hour, equipped with an integral 11499 ACFM external return air cyclone and bag filter system and exhausting back inside the source.
 - (2) Shop 2, identified as DC2, constructed in 1968, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
 - (3) Shop 3, identified as DC3, constructed in 1988, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
 - (4) Shop 4, identified as DC4, constructed in 2001, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.

Insignificant Activities:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: woodworking and machining operations separate from Woodworking Shops 1 through 4.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
DC1	Woodworking Shop 1	1.57	5.53

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.3 Particulate Control

- (a) In order to comply with Conditions D.2.1, the cyclone and bag filters for particulate control shall be in operation and control emissions from Shop 1 (DC1) and insignificant woodworking operations at all times when Shop 1 (DC1) and insignificant woodworking facilities are in operation.
- (b) In order to assure Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4) are not subject to the requirements of 326 IAC 6-3-2, the integral bag filter systems for particulate control shall be in operation and control emissions from Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4) at all times Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4) are in operation.

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

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

D.2.4 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.5 Broken or Failed Bag Detection

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

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

D.2.6 Baghouse and Cyclone Inspections

The Permittee shall perform semi-annual inspections of the cyclone and bag filters controlling particulate from the woodworking shops and insignificant woodworking operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the dates and results of the inspections.

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

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant activities:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (2) One (1) natural gas-fired air make-up unit, identified as AM-1, permitted in 2000, with a maximum heat input capacity of 4.90 MMBtu/hr, exhausting to stack HSV1.
 - (3) One (1) natural gas-fired air make-up unit, identified as AM-2, permitted in 2000, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV2.
 - (4) One (1) natural gas-fired air make-up units, identified as AM-3, permitted in 2003, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV3.
 - (5) Six (6) natural gas-fired thermo cycler heaters, identified as H-33, H-34, H-35, H-36, H-37, and H-38, permitted in 2000, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting to stacks HSV4 - HSV9.
 - (6) One (1) natural gas-fired thermo cycler heater, identified as H-43, permitted in 2016, with a maximum heat input capacity of 0.50 MMBtu/hr, exhausting to stack HSV10.
 - (7) One (1) natural gas-fired thermo cycler heater, identified as H-44, permitted in 2012, with a maximum heat input capacity of 0.40 MMBtu/hr, exhausting to stack HSV11.
 - (8) Two (2) natural gas fueled Thermo-Cyclers, identified as H-79-1 and H-79-2, permitted in 2016, with a maximum heat input capacity of 0.58 MMBtu/hr, each, using no controls, and exhausting to stack HSV12 and HSV13, respectively.
 - (9) One (1) natural gas fueled office furnace, identified as H-79-3, permitted in 2016, with a maximum heat input capacity of 0.093 MMBtu/hr, using no controls, and exhausting to stack HSV14.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

D.3.1 Particulate Emission Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Air make up unit	AM-1	0.57
Air make up unit	AM-2	0.57
Air make up unit	AM-3	0.55

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Emission Unit	Unit ID	Pt (lb/MMBtu)
Thermo-Cycler	H-33 - H-38	0.57
Thermo-Cycler	H-44	0.55
Thermo-Cycler	H-43	0.55
Thermo-Cycler	H-79-1, H-79-2	0.55
Office furnace	H-79-3	0.55

D.3.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the combined particulate emissions from any insignificant brazing equipment, cutting torches, soldering equipment, or welding equipment shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, based on a process weight rate of less than 100 pounds per hour.

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NESHAP

SECTION E.1

Emissions Unit Description:

Insignificant activities:

- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

Under 40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities the gasoline fuel transfer and dispensing operation is an affected facility.

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

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

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities NESHAP [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B to the operating permit) for the emission unit listed above:

- (1) 40 CFR 63. 11110
- (2) 40 CFR 63. 11111(a)
- (3) 40 CFR 63. 11111(b)
- (4) 40 CFR 63. 11111(e)
- (5) 40 CFR 63. 11111(f)
- (6) 40 CFR 63. 11112(a)
- (7) 40 CFR 63. 11112(d)
- (8) 40 CFR 63. 11113(b)
- (9) 40 CFR 63. 11113(c)
- (10) 40 CFR 63. 11116
- (11) 40 CFR 63. 11130
- (12) 40 CFR 63. 11131
- (13) 40 CFR 63. 11132

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(14) Table 3 to Subpart CCCCCC of Part 63

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

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

Source Name: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007

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:

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**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: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007

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) daytime 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 2-8-12.

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:

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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: _____

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

FESOP Quarterly Report

Source Name: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007
Facility: Line 49, Line 54, Line 57, Line 58, DS1, Lamination, SB1, and SB2
Parameter: VOC
Limit: The total VOC input to the emissions units listed shall not exceed ninety four and sixty-seven hundredths (94.67) 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: _____

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**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: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
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Permit Requirement (specify permit condition #)	
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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: _____

Attachment A

Federally Enforceable State Operating Permit (FESOP) No: 087-30645-00007

Reserved

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name: Jayco, Inc. - Topeka
Source Location: 536 Michigan Street, Topeka, Indiana 46571
County: LaGrange
SIC Code: 3792 (Travel Trailers and Campers)
Operation Permit No.: F 087-30645-00007
Operation Permit Issuance Date: July 25, 2012
Significant Permit Revision No.: 087-36627-00007
Permit Reviewer: Doug Logan

On December 16, 2015, the Office of Air Quality (OAQ) received an application from Jayco, Inc. - Topeka related to a modification to an existing stationary travel trailer and camper manufacturing operation.

Existing Approvals

The source was issued FESOP Renewal No. F087-30645-00007 on July 25, 2012. There have been no subsequent approvals issued.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 LaGrange County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
 LaGrange County has been classified as attainment or unclassifiable in Indiana for all other 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.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of FESOP Renewal No.: 087-30645-00007 issued on July 25, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Surface Coating- EU-A, EU-B, EU-C, EU-D and EU-E	84.56	84.56	84.56	0.00	0.00	68.23	0.00	0.00	<24.89	<9.89 Toluene
Repair Booths - RB3 and RB4	0.34	0.34	0.34	0.00	0.00	3.94	0.00	0.00	0.96	0.77 Toluene
Woodworking - Shops DC1, DC2, DC3 and DC4	6.23	6.23	6.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paved Roads	0.16	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion Units	0.11	0.44	0.44	0.03	5.75	0.32	4.83	6,948	0.11	0.10 Hexane
Total PTE of Entire Source	91.40	91.59	91.57	0.03	5.75	72.48	4.83	6,948	<25	<10
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

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Jayco, Inc. - Topeka on December 16, 2015, relating to construction of a new recreational vehicle assembly line, two (2) lamination operations, and new natural gas fueled space heating equipment, and modifications including

changes in the method of operation of existing RV assembly processes and woodworking, and replacement of woodworking dust collectors.

The following is a list of the new emission units:

- One (1) recreational vehicle assembly operation, identified as Line 49, approved in 2016 for construction, with a maximum capacity of 0.50 units per hour, using no controls, and exhausting indoors.
- One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 1, approved in 2016 for construction, with a maximum capacity of 4.25 panels per hour, using no controls and exhausting to stack L1SV1.
- One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 2, approved in 2016 for construction, with a maximum capacity of 8.00 panels per hour, using no controls and exhausting to stack L2SV1.

The following is a list of the modified emission units and pollution control device(s):

- One (1) dip stain coating operation, identified as DS1, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 9.5 units per hour, using dip, roller, and wipe application methods, with no VOC controls and exhausting indoors.
- One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, consisting of:
 - One (1) recreational vehicle assembly operation, identified as Line 54, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 4.25 units per hour, using no controls, and exhausting indoors.
 - One (1) recreational vehicle assembly operation, identified as Line 57, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.00 units per hour, using no controls, and exhausting indoors.
 - One (1) recreational vehicle assembly operation, identified as Line 58, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.75 units per hour, using no controls, and exhausting indoors.
- One (1) touchup booth, identified as SB1, constructed in 2003, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB1.
- One (1) touchup booth, identified as SB2, constructed in 1999, approved in 2016 for modification, with a maximum capacity of 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as SVSB2.
- Shop 2, identified as DC2, constructed in 1968, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
- Shop 3, identified as DC3, constructed in 1988, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting indoors.
- Shop 4, identified as DC4, constructed in 2001, approved in 2016 for modification, with a maximum capacity of 295 pounds of wood per hour, using an integral bag filter system for particulate control,

and exhausting indoors.

The following is a list of emission units that have been removed:

- One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.
- One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.
- One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.

The following is a list of new insignificant activities:

- Two (2) natural gas fueled Thermo-Cyclers, identified as H-79-1 and H-79-2, permitted in 2016, with a maximum heat input capacity of 0.50 MMBtu/hr, each, using no controls, and exhausting to stack HSV12 and HSV13, respectively.
- One (1) natural gas fueled office furnace, identified as H-79-3, permitted in 2016, with a maximum heat input capacity of 0.093 MMBtu/hr, using no controls, and exhausting to stack HSV14.

The following is a list of modified insignificant activities:

Pursuant to 326 IAC 2-1.1-3(e) modifications with a PTE less than the levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) are exempt from the permit revision requirements under 326 IAC 2-8-11.1, including the requirement to submit an application.

- One (1) natural gas-fired Thermo-Cycler, identified as H-43, permitted in 2016, with a maximum heat input capacity of 0.50 million British thermal units per hour (MMBtu/hr), using no controls, and exhausting to stack HSV10.

The following is a list of insignificant activities that have been removed:

- One (1) natural gas-fired boiler with a maximum heat input capacity of 0.439 MMBtu/hr.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level, PSD applicability, and 326 IAC 6-3 applicability. Operating conditions in the proposed permit will specify that cyclones and dust collectors shall operate at all times when the woodworking shops are in operation.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification New Units	
Pollutant	Potential To Emit (ton/yr)
PM	1.43E-02
PM ₁₀	5.72E-02
PM _{2.5}	5.72E-02
SO ₂	4.52E-03
NO _x	0.75
VOC	32.97
CO	0.63
Single HAPs	<10
Total HAPs	0.73

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Increase from Modification (ton/yr)
PM	86.07	1.15	0
PM ₁₀	86.07	1.15	0
PM _{2.5}	86.07	1.15	0
SO ₂	--	--	--
NO _x	--	--	--
VOC	72.16	102.39	30.22
CO	--	--	--
HAPs	35.82	3.73	0

Total PTE Increase due to the Modification			
Pollutant	PTE New Emission Units (ton/yr)	Net Increase to PTE of Modified Emission Units (ton/yr)	Total PTE for New and Modified Units (ton/yr)
PM	1.43E-02	0	1.43E-02

PM ₁₀	5.72E-02	0	5.72E-02
PM _{2.5}	5.72E-02	0	5.72E-02
SO ₂	4.52E-03	--	4.52E-03
NO _x	0.75	--	0.75
VOC	32.97	30.22	63.19
CO	0.63	--	0.63
HAPs	0.73	0	0.73

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of VOC.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Surface Coating – EU-A, EU-B, EU-C, EU-D and EU-E Dip stain coating	84.56 --	84.56 --	84.56 --	0.00 --	0.00 --	68.23 94.67	-- --	0.00 0.00	<24.89 6.82E-02	<0.89 Toluene
Line 54	-- --	-- --	-- --	-- --	-- --	-- --	-- --	-- --	1.27 1.27	
Line 57	-- --	-- --	-- --	-- --	-- --	-- --	-- --	-- --	0.60 0.60	
Line 58	-- --	-- --	-- --	-- --	-- --	-- --	-- --	-- --	0.82 0.82	
Repair Booths – RB3 and RB4 Touchup Booths SB1 & SB2	0.34 0.34	0.34 0.34	0.34 0.34	0.00 0.00	0.00 0.00	3.94 3.94	0.00 0.00	0.00 0.00	0.96 0.96	0.77 Toluene
Line 49	-- --	-- --	-- --	-- --	-- --	-- --	-- --	-- --	0.15 0.15	
Lamination	-- --	-- --	-- --	-- --	-- --	-- --	-- --	-- --	0.57 0.57	
Woodworking - Shops DC1, DC2, DC3 and DC4	6.23 5.87	6.23 5.87	6.23 5.87	0.00 --	0.00 --	0.00 --	0.00 --	0.00 0.00	0.00 --	0.00 0.00
Paved Roads	0.16 0.03	0.03 0.03	0.01 0.01	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00
Natural Gas Combustion Units	0.11 0.46	0.44 0.46	0.44 0.46	0.03 3.62E-02	5.75 6.03	0.32 0.33	4.83 5.07	6,948 6,948	0.11 0.11	0.10 Hexane --
Total PTE of Entire Source	91.40 6.32	91.59 6.66	91.57 6.66	0.03 3.62E-02	5.75 6.03	72.48 95.00	4.83 5.07	6,948 6,948	<25 4.56	<10 <10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	400,000	25	40
PSD Major Source Thresholds	250	250	250	250	250	250	250	400,000	NA	NA

*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 table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs		

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs
Dip stain coating	--	--	--	--	--	94.67	--	6.82E-02
Line 54	--	--	--	--	--		--	1.27
Line 57	--	--	--	--	--		--	0.60
Line 58	--	--	--	--	--		--	0.82
Touchup Booths SB1 & SB2	0.34	0.34	0.34	--	--		--	0.96
Line 49	--	--	--	--	--		--	0.15
Lamination	--	--	--	--	--		--	0.57
Woodworking - Shops DC1, DC2, DC3 and DC4	5.87	5.87	5.87	--	--	--	--	--
Natural Gas Combustion Units	0.11	0.46	0.46	3.62E-02	6.03	0.33	5.07	0.11
Total PTE of Entire Source	6.32	6.66	6.66	3.62E-02	6.03	95.00	5.07	4.56
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

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

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(1) Criteria Pollutants

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

- (A) The total VOC input to the emissions units listed in the table below shall not exceed ninety four and sixty-seven hundredths (94.67) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Emissions Unit
Dip stain coating DS1
Line 54
Line 57
Line 58
Touchup Booth SB1
Touchup Booth SB2
Line 49
Lamination

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

Federal Rule Applicability Determination

(a) New Source Performance Standards (NSPS)

- (1) 40 CFR 60, Subpart Dc
The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included for this proposed revision, since the two (2) natural gas fueled Thermo-Cyclers and one (1) office furnace are not steam generating units. Therefore, the requirements of the NSPS are not included in this revision.
 - (2) 40 CFR 60, Subpart MM
The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included for this proposed revision, since the recreational vehicle assembly operation, identified as Line 49 is not a prime coat operation, guide coat operation, or topcoat operation in an automobile or light truck assembly plant. Therefore, the requirements of the NSPS are not included in this revision.
 - (3) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
- (1) 40 CFR 63, Subpart IIII
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85, are not included for this proposed revision, since the recreational vehicle assembly operation, identified as Line 49 is not located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks and the source is not a major source of HAP emissions. Therefore, the requirements of the NESHAP are not included in this revision.
 - (2) 40 CFR 63, Subpart MMMM
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included for this proposed revision, since the recreational vehicle assembly operation, identified as Line 49, and the Lamination operation will not coat metal parts of recreational vehicles and the source is not a major source of HAP emissions. Therefore, the requirements of the NESHAP are not included in this revision.
 - (3) 40 CFR 63, Subpart PPPP
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 PPPP and 326 IAC 20-81, are not included for this proposed revision, since the source is not a major source of HAP emissions. Therefore, the requirements of the NESHAP are not included in this revision.
 - (4) 40 CFR 63, Subpart HHHHHH
 - (A) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included for this proposed revision since the recreational vehicle assembly operation, identified as Line 49, and the Lamination operation will coat mobile equipment parts or subassemblies at a recreational vehicle assembly plant. The definition of *Motor vehicle and mobile equipment surface coating* at 40 CFR 63.11237 excludes the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant. Line 49 and the Lamination operations will not perform spray application of coatings

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

- (B) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included for the modified recreational vehicle assembly operations, identified as Line 54, Line 57, and Line 58 because the operations coat mobile equipment parts or subassemblies at a recreational vehicle assembly plant. The definition of *Motor vehicle and mobile equipment surface coating* at 40 CFR 63.11237 excludes the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant. Lines 54, 57, and 58 do not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
 - (C) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included for the modified dip stain coating operation, identified as DS1, because the unit does not spray-apply coatings.
 - (D) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included for the touchup booths,, identified as SB1 and SB2, because the units do not spray-apply coatings. The touchup operations use non-refillable aerosol containers and hand-held devices with a paint cup capacity less than or equal to 3 fluid ounces that are excluded from the definition of *spray-applied surface coating* in 40 CFR 63.11237.
- (5) 40 CFR 63, Subpart JJJJJJ
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included for this proposed revision, since the Thermo-cyclers, H-79-1 and H-79-2, and office furnace, H-79-3, are not boilers as defined at 40 CFR 63.11237. The units are not enclosed devices using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water. Therefore, the requirements of the NESHAP are not included in this revision.
- (6) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (c) Compliance Assurance Monitoring (CAM)
- Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP)
 This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
 The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units 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 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
 Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Indirect Heating Units Which Were in Existence on or Began Operation After September 21, 1983						
Facility	Construction (Removal) Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Boiler	before 6/8/1972 (2006)	4.19	4.19	---	--	---
Boiler	before 6/8/1972 (2015)	0.439	0.439	--	--	--
AM-1	2000	4.90	12.33 ¹	0.57	0.57	0.002
AM-2	2000	2.00	12.33 ¹	0.57	0.57	0.002
H-33 - H-38	2000	6 x 0.50	12.33 ¹	0.57	0.57	0.002
H-39 - H-42	2000	4 x 0.20	12.33 ¹	--	--	--

Indirect Heating Units Which Were in Existence on or Began Operation After September 21, 1983						
Facility	Construction (Removal) Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
	(2012)					
AM-3	2003	2.00	14.33 ²	0.55	0.55	0.002
H-43	2012 (2015)	0.40	13.14 ³	--	--	--
H-44	2012	0.40	13.14 ³	0.56	0.56	0.002
H-43	2016	0.50	14.05 ⁴	0.55	0.55	0.002
H-79-1, H-79-2	2016	2 x 0.58	14.05 ⁴	0.55	0.55	0.002
H-79-3	2016	0.093	14.05 ⁴	0.55	0.55	0.002

Notes:

1. 2000 construction, 12.33 = 1.19 + 0.439 + 4.90 + 2.00 + (6 x 0.50) + (4 x 0.40)
2. 2003 construction, 14.33 = 12.33 + 2.00
3. 2012 construction, 13.14 = 0.439 + 4.90 + 2.00 + (6 x 0.50) + 2.00 + 0.40 + 0.40
4. 2016 construction, 14.05 = 4.90 + 2.00 + (6 x 0.50) + 2.00 + 0.40 + 0.50 + (2 x 0.58) + 0.093

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

- (1) IDEM, OAQ has determined that application of Russell Products RP-676 aerosol adhesive and Henkel Adhesive/Sealant in RV assembly operations using non-atomizing spray do not generate particulate emissions. Therefore, 326 IAC 6-3-2 is not applicable.
- (2) Pursuant to 326 IAC 6-3-1(b)(12), applications of aerosol coating products to repair minor surface damage and imperfections are exempt from 326 IAC 6-3. Therefore, the requirements of the rule are not included in this revision for the use of aerosol products in the modified touchup booths, SB1 and SB2.
- (3) Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes, not otherwise exempt in subdivisions (5) through (8), that use less than five (5) gallons per day are exempt from 326 IAC 6-3. Therefore, the requirements of the rule are not included in this revision for HVLP spray in the modified touchup booths, SB1 and SB2.
- (4) The following units are subject to 326 IAC 6-3-2(e). The table below outlines the limits the source must comply with.

Process Description	Process Weight Rate (ton/hr)	326 IAC 6-3-2 Limit (lb/hr)	PM Prior to Consideration of the Control Device (lb/hr)	PM PTE After Consideration of the Control Device (lb/hr)
Woodworking, DC2	0.1475	1.13	6.17	6.17E-02
Woodworking, DC3	0.1475	1.13	6.17	6.17E-02
Woodworking, DC4	0.1475	1.13	6.17	6.17E-02

Particulate emissions prior to consideration of the integral devices for the above facilities are above 0.551 lb/hr. Therefore, compliance monitoring and determination requirements for the baghouses will be placed in the permit in order to assure the woodworking operations are exempt from the requirements of 326 IAC 6-3-2.

- (f) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 - (1) Pursuant to 326 IAC 8-1-6(1), the proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new unit is less than twenty-five (25) tons per year.
 - (2) Pursuant to 326 IAC 8-1-6, the modified units, DS1 (formerly EU-C) and Lines 54, 57, and 58 (formerly EU-D), are not subject to 326 IAC 8-1-6 because the units were constructed before January 1, 1980.
- (g) 326 IAC 8-2-2 (VOC Rules: Automobile and Light Duty Truck Coating Operations)
Pursuant to 326 IAC 8-2-2(a), 326 IAC 8-2-2 is not applicable to Line 49 and the Lamination operation because the units do not coat automobile and light duty truck bodies, hoods, fenders, cargo boxes, doors, and grill opening panels.
- (h) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a)(1), subsections (b), (c), (e), and (f) are not applicable to Line 49 and the Lamination operation because the units do not coat metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39. Pursuant to 326 IAC 8-2-9(a)(2), subsections (d) and (f) are not applicable to Line 49 and the Lamination operation because the source is not located in Lake or Porter County.
- (i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination requirements applicable to this proposed revision are as follows:
 - (1) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
 - (2) The cyclone and bag filters for particulate control shall be in operation and control emissions from the woodworking shops and insignificant woodworking operations at all times when the woodworking shops and insignificant woodworking facilities are in operation.
 - (3) In order to ensure that the Woodworking Shops 2, 3, and 4 are not subject to the requirements of 326 IAC 6-3-2, the integral bag filter systems DC2, DC3, and DC4 for particulate control shall be in operation and control emissions from the Woodworking Shops 2, 3, and 4 at all times the associated facility is in operation.
- (b) The compliance monitoring requirements applicable to this proposed revision are as follows:
 - (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit.

- (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit.
- (3) The Permittee shall perform semi-annual inspections of the cyclone and bag filters controlling particulate from the woodworking shops and insignificant woodworking operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

These monitoring conditions are necessary because the cyclone and bag filters for the woodworking shops and insignificant woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and the integral bag filter systems DC2, DC3, and DC4 must operate properly to ensure that the Woodworking Shops 2, 3, and 4 are not subject to the requirements of 326 IAC 6-3-2.

- (c) There are no testing requirements applicable to this proposed revision.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

Summary of IDEM Updates Throughout the Permit

- (a) Descriptive information regarding emissions units was added or revised.
- (b) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule citation of the "trivial activities" definition.
- (c) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."
The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification. Therefore, IDEM, OAQ has removed GHG-related language from Condition C.2 - Overall Source Limit.
- (d) IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (e) IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (f) IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

- (g) IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.
- (h) IDEM added the rule citation 326 IAC 2-8-4(1) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions:

Compliance Determination Requirements **[326 IAC 2-8-4(1)]**

- (i) The FESOP Compliance Monitoring Requirements rule cites have been changed from 326 IAC 2-8-4 and 326 IAC 2-8-5(1) to 326 IAC 2-8-4(1) and 326 IAC 2-8-5(1) to match the other rule cites. Compliance Monitoring Requirements subsection titles in Sections D.1 and D.2 were revised as follows:

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

- (j) IDEM revised Sections E.1 and E.2 for clarity.

Section A - Revisions

- (a) IDEM revised the SIC Code description in Condition A.1 - General Information to match the 1987 SIC Code manual.
- (b) Section A has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section A has been revised as follows:

...

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

The Permittee owns and operates a stationary travel trailer and camper manufacturing operation.

Source Address:	536 W. Michigan Street, Topeka, Indiana 46571
General Source Phone Number:	574-825-0564
SIC Code:	3792 (Travel trailer and camper manufacturing Trailers and Campers)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- ~~(a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.~~
- ~~(b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.~~

~~Under 40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants for Source Category: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, EU-A and EU-B are considered affected facilities.~~

- (ga) ~~One (1) roller and dip stain coating operation, supporting a maximum source capacity of 4.5 vehicles per hour, identified as EU-C DS1, constructed in 1964, approved in 2016 for modification, using no controls, utilized for wood and plastic substrates, equipped for roller and wipe methods of application, and exhausting to one (1) stack, identified as Stack 5 with a maximum capacity of 9.5 units per hour, using dip, roller, and wipe application methods, with no VOC controls and exhausting indoors.~~
- (db) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, **consisting of:** identified as EU-D, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using no controls, using the aerosol can, roller and wipe methods of application, and exhausting to general ventilation in Building 1.
- (1) **One (1) recreational vehicle assembly operation, identified as Line 54, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 4.25 units per hour, using no controls, and exhausting indoors.**
- (2) **One (1) recreational vehicle assembly operation, identified as Line 57, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.00 units per hour, using no controls, and exhausting indoors.**
- (3) **One (1) recreational vehicle assembly operation, identified as Line 58, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.75 units per hour, using no controls, and exhausting indoors.**
- ~~(e) One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.~~
- ~~(f) Two (2) touchup and repair paint booths, described as follows:~~
- (1c) ~~Repair Booth 3 for coating of travel trailer exteriors (predominantly fiberglass substrates),~~ **One (1) touchup booth, identified as SB1, constructed in 2003, approved in 2016 for modification, with a maximum capacity of 2.0 recreational vehicles (RVs) 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-33 SVSB1, and consisting of the following equipment: one (1) air atomized spray paint gun.**
- (2d) ~~Repair Booth 4 for coating of travel trailer exteriors (predominantly fiberglass substrates),~~ **One (1) touchup booth, identified as SB2, constructed in 1999, approved in 2016 for modification, with a maximum capacity of 2.0 recreational vehicles (RVs) 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-28 SBSV2, and consisting of the following equipment:**
- (A) ~~two (2) paint pots;~~
- (B) ~~one (1) air atomized wash gun;~~
- (C) ~~five (5) air atomized cup paint guns, identified as PGRV-001 through PGRV-005; and~~

~~(D) — one (1) wash tank for the cup paint guns.~~

- (ge) Four (4) woodworking shops, described as follows:
- (1) ...
 - (2) Shop 2, identified as DC2, constructed in 1968, **approved in 2016 for modification**, with a maximum capacity of ~~565~~ **295** pounds of wood per hour, using an integral ~~cyclone~~ **bag filter system** for particulate control, and exhausting ~~to one (1) stack, identified as Stack 9~~ **indoors**.
 - (3) Shop 3, identified as DC3, constructed in 1988, **approved in 2016 for modification**, with a maximum capacity of 295 pounds of wood per hour, using an integral ~~cyclone~~ **bag filter system** for particulate control, and exhausting ~~to one (1) stack, identified as Stack 10~~ **indoors**.
 - (4) Shop 4, identified as DC4, constructed in 2001, **approved in 2016 for modification**, with a maximum capacity of ~~400~~ **295** pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting ~~inside the building and then to general ventilation~~ **indoors**.
- (f) **One (1) recreational vehicle assembly operation, identified as Line 49, approved in 2016 for construction, with a maximum capacity of 0.50 units per hour, using no controls, and exhausting indoors.**
- (g) **One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 1, approved in 2016 for construction, with a maximum capacity of 4.25 panels per hour, using no controls and exhausting to stack L1SV1.**
- (h) **One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 2, approved in 2016 for construction, with a maximum capacity of 8.00 panels per hour, using no controls and exhausting to stack L2SV1.**

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) ...
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - ~~(1) — One (1) natural gas-fired boiler with maximum heat input capacities of 0.439 MMBtu/hr.~~
 - (21) Various heating units.
 - ~~(3) — Three (3) natural gas-fired air make-up units, identified as AM-1, AM-2, and AM-3, with maximum heat input capacities of 4.9, 2.0, and 2.0 MMBtu/hr.~~
 - (2) **One (1) natural gas-fired air make-up unit, identified as AM-1, permitted in 2000, with a maximum heat input capacity of 4.90 MMBtu/hr, exhausting to stack HSV1.**
 - (3) **One (1) natural gas-fired air make-up unit, identified as AM-2, permitted in**

2000, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV2.

- (4) **One (1) natural gas-fired air make-up units, identified as AM-3, permitted in 2003, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV3.**
- (45) Six (6) natural gas-fired thermo cycler heaters, identified as H-33, H-34, H-35, H-36, H-37, and H-38, **permitted in 2000**, each with a maximum heat input capacity of 0.50 MMBtu/hr, **each**, exhausting to stacks ~~identified as H-33, H-34, H-35, H-36, H-37 and H-38~~ **HSV4 - HSV10.**
- ~~(5) Two (2) natural gas-fired thermo cycler heaters, identified as H-43 and H-44, each with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting to stacks identified as H-39, H-40, H-41 and H-42.~~
- (6) **One (1) natural gas-fired thermo cycler heater, identified as H-43, permitted in 2016, with a maximum heat input capacity of 0.50 MMBtu/hr, exhausting to stack HSV10.**
- (7) **One (1) natural gas-fired thermo cycler heater, identified as H-44, permitted in 2012, with a maximum heat input capacity of 0.40 MMBtu/hr, exhausting to stack HSV11.**
- (8) **Two (2) natural gas fueled Thermo-Cyclers, identified as H-79-1 and H-79-2, permitted in 2016, with a maximum heat input capacity of 0.58 MMBtu/hr, each, using no controls, and exhausting to stack HSV12 and HSV13, respectively.**
- (9) **One (1) natural gas fueled office furnace, identified as H-79-3, permitted in 2016, with a maximum heat input capacity of 0.093 MMBtu/hr, using no controls, and exhausting to stack HSV14.**

(c) ...

Section B and Section C - Revisions

Section B and Section C have been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section B and Section C have been revised as follows:

...

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(4042). 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).

...

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and ~~greenhouse gases (GHGs)~~, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) ~~The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂-equivalent emissions (CO₂e) per twelve (12) consecutive month period.~~

(b) ...

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

(a) **For new units:**

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) **For existing units:**

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

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

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

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

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

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

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

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, **where applicable:**
- (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 permit.
- Records of required monitoring information include the following, **where applicable:**
- (AA) ...

Section D.1 - Revisions

- (a) IDEM, OAQ deleted Condition D.1.1 - Hazardous Air Pollutants because the potential to emit HAPs of the source is less than major source levels.
- (b) IDEM, OAQ deleted Condition D.1.2 - Volatile Organic Compounds Limitation because the hot melt glue operation, identified as EU-E, was removed.
- (c) IDEM, OAQ deleted Condition D.1.3 - Particulate because the requirements of 326 IAC 6-3-2(d) are not applicable to new and modified emissions units at the source.
- (d) IDEM, OAQ added a new Condition D.1.1 - FESOP Limitation to incorporate VOC limits required by the 326 IAC 2-8-4.
- (e) IDEM revised numbering and lettering of conditions and paragraphs as necessary to accommodate deleted and inserted material.
- (f) IDEM, OAQ updated Condition D.1.2 - Preventive Maintenance Plan to current model language.
- (g) IDEM, OAQ revised Condition D.1.3 - Volatile Organic Compounds to include compliance determination requirements for the VOC limit and remove requirements relating to HAPs.
- (h) IDEM deleted Condition D.1.6 - Particulate Controls because the new and modified emissions units are not subject to 326 IAC 6-3-2(d).
- (i) IDEM deleted the subsection heading Compliance Monitoring Requirements and Condition D.1.7 - Monitoring because the new and modified emissions units do not require control devices.
- (j) IDEM revised Condition D.1.4 - Record Keeping Requirements to include requirements for the VOC limit in the new Condition D.1.1.
- (k) IDEM, OAQ deleted paragraph (b) of Condition D.1.4 because monitoring requirements are not applicable.
- (l) IDEM, OAQ updated Condition D.1.5 - Reporting Requirements as required by the new VOC limit and current model language.
- (b) Section D.1 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section D.1 has been revised as follows:

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.~~

~~(b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.~~

~~Under 40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants for Source Category: Paint Striping and Miscellaneous Surface Coating Operations at Area Sources, EU-A and EU-B are considered affected facilities.~~

(ea) One (1) roller and dip stain coating **operation**, supporting a maximum source capacity of 4.5 vehicles per hour, identified as **EU-C DS1**, constructed in 1964, **approved in 2016 for modification**, using no controls, utilized for wood and plastic substrates, equipped for roller and wipe methods of application, and exhausting to one (1) stack, identified as **Stack 5 with a maximum capacity of 9.5 units per hour, using dip, roller, and wipe application methods, with no VOC controls and exhausting indoors.**

(db) One (1) surface coating and adhesives application operation for the coating of wood and fiberglass substrates, **consisting of:** ~~identified as EU-D, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using no controls, using the aerosol can, roller and wipe methods of application, and exhausting to general ventilation in Building 1.~~

(1) **One (1) recreational vehicle assembly operation, identified as Line 54, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 4.25 units per hour, using no controls, and exhausting indoors.**

(2) **One (1) recreational vehicle assembly operation, identified as Line 57, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.00 units per hour, using no controls, and exhausting indoors.**

(3) **One (1) recreational vehicle assembly operation, identified as Line 58, constructed in 1964, approved in 2016 for modification, with a maximum capacity of 2.75 units per hour, using no controls, and exhausting indoors.**

~~(e) One (1) hot melt glue operation, identified as EU-E, constructed in 1999, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using a raw material input of 325 pounds of plywood per hour and 330 pounds of fiberglass panels per hour, using no controls, and exhausting to one (1) stack, identified as Stack SV-29.~~

~~(f) Two (2) touchup and repair paint booths, described as follows:~~

(1c) ~~Repair Booth 3 for coating of travel trailer exteriors (predominantly fiberglass substrates);~~ **One (1) touchup booth, identified as SB1, constructed in 2003, approved in 2016 for modification, with a maximum capacity of 2.0 recreational vehicles (RVs) 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-33 SVSB1, and consisting of the following equipment: one (1) air atomized spray paint gun.**

- (2d) **Repair Booth 4 for coating of travel trailer exteriors (predominantly fiberglass substrates), One (1) touchup booth, identified as SB2, constructed in 1999, approved in 2016 for modification, with a maximum capacity of 2.0 recreational vehicles (RVs) 4.5 units per hour, using dry filters for particulate control, exhausting through one (1) stack, identified as Stack SV-28 SBSV2., and consisting of the following equipment:**
- (A) ~~two (2) paint pots.~~
 - (B) ~~one (1) air atomized wash gun.~~
 - (C) ~~five (5) air atomized cup paint guns, identified as PGRV-001 through PGRV-005.~~
 - (D) ~~one (1) wash tank for the cup paint guns.~~
- (f) **One (1) recreational vehicle assembly operation, identified as Line 49, approved in 2016 for construction, with a maximum capacity of 0.50 units per hour, using no controls, and exhausting indoors.**
- (g) **One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 1, approved in 2016 for construction, with a maximum capacity of 4.25 panels per hour, using no controls and exhausting to stack L1SV1.**
- (h) **One (1) lamination operation for wall, roof, and floor panels, identified as Laminator 2, approved in 2016 for construction, with a maximum capacity of 8.00 panels per hour, using no controls and exhausting to stack L2SV1.**

(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 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1]~~

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

- ~~(a) The total input of any single HAP, including coatings, dilution solvents and cleaning solvents to the coating operations EU-A, EU-B, EU-C, EU-D and repair booths 3 and 4 and hot melt glue operation shall not exceed 9.89 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The total input of any combination of HAPs, including coatings, dilution solvents and cleaning solvents to the coating operations EU-A, EU-B, EU-C, EU-D and repair booths 3 and 4 and hot melt glue operation shall not exceed 24.89 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

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

~~D.1.2 Volatile Organic Compounds (VOC) Limitation (326 IAC 8-1-6)~~

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

~~The VOC input, including coatings, dilution solvents and cleaning solvents delivered to the applicators of the hot melt glue operation shall be limited to less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

Compliance with this limit renders 326 IAC 8-1-6 not applicable.

~~D.1.3 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to 326 IAC 6-3-2 (d), particulate from each surface coating operation, shall be controlled by the dry filters, waterwash or an equivalent control device, and the Permittee shall operate each control device in accordance to manufacturer's specifications.~~

D.1.1 FESOP Limitations (VOC) [326 IAC 2-8]

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

- (a) **The total VOC input to the emissions units listed in the table below shall not exceed ninety four and sixty-seven hundredths (94.67) tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Emissions Unit
Dip stain coating DS1
Line 54
Line 57
Line 58
Touchup Booth SB1
Touchup Booth SB2
Line 49
Lamination

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

~~D.1.42 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

~~D.1.53 Volatile Organic Compounds (VOC) and HAPs [326 IAC 8-1-2][326 IAC 8-1-4]~~

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

~~D.1.6 Particulate Control~~

~~In order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation at all times when each surface coating operation (EU-A, EU-b, and Repair Booths 3 and 4) is in operation.~~

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

~~D.1.7 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1, 2, 3, 4, 7, SV28, and~~

~~SV33) 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. Section C - Response to Excursions or 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.~~

- ~~(b) Monthly inspections shall be performed of the coating 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. Section C - Response to Excursions or 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.1.84 Record Keeping Requirements

-
- (a) To document the compliance status with Conditions D.1.1 and ~~D.1.2~~, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(2)** below. Records maintained for (1) through ~~(6)~~ **(2)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage **emission** limits established in Conditions D.1.1 and ~~D.1.2~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAPs usage **content** of each coating material and solvent used;
- ~~(2) A log of the dates of use;~~
- (32)** The amount of coating material and solvent ~~less water~~ used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- ~~(4) The coating materials including cleanup solvent usage for each month;~~
- ~~(5) The total VOC and HAPs usage and VOC usage at the hot melt glue operation, including clean up solvents for each month;~~
- ~~(6) The weight of VOC and HAPs emitted for each compliance period.~~
- ~~(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (eb)** Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.95 Reporting Requirements

A quarterly **report of total VOC input and a** summary of the information to document the compliance status with Conditions D.1.1 ~~and D.1.2~~ shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report ~~submitted by the Permittee~~ does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Section D.2 - Revisions

- (a) IDEM, OAQ deleted Condition D.2.1 - Particulate Matter PM, PM₁₀ and PM_{2.5} Limitations because the U.S. EPA has determined that PSD applicability should be determined after controls that are integral to the process.
- (b) IDEM revised numbering and lettering of conditions and paragraphs as necessary to accommodate deleted and inserted material.
- (c) IDEM revised Condition D.2.1 - Particulate Matter because of changes in the method of operation of modified emissions units.
- (d) IDEM, OAQ updated Condition D.2.2 - Preventive Maintenance Plan to current model language.
- (e) IDEM, OAQ revised Condition D.2.3 - Particulate Control because of changes in the modified emissions units and model language.
- (f) IDEM, OAQ deleted Condition D.2.5 - Visible Emissions Notations because the modified emissions units exhaust indoors.
- (g) IDEM updated Condition D.2.4 - Cyclone Failure Determination to current model language.
- (h) IDEM updated Condition D.2.5 - Broken or Failed Bag Detection to current model language.
- (i) IDEM added a new Condition D.2.6 - Baghouse and Cyclone Inspection to incorporate compliance monitoring requirements for control devices that exhaust indoors.
- (j) IDEM deleted visible emissions record keeping and added inspection record keeping to Condition D.2.7 - Record Keeping Requirements.
- (k) Section D.2 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section D.2 has been revised as follows:

SECTION D.2 FACILITY EMISSIONS UNIT OPERATION CONDITIONS

Facility Emissions Unit Description [~~326 IAC 2-7-5(15)~~]:

- (g) Four (4) woodworking shops, described as follows:
 - (1) ...
 - (2) Shop 2, identified as DC2, constructed in 1968, **approved in 2016 for modification**, with a maximum capacity of ~~565~~ **295** pounds of wood per hour, using an integral ~~cyclone~~ **bag filter system** for particulate control, and exhausting ~~to one (1) stack, identified as Stack 9~~ **indoors**.
 - (3) Shop 3, identified as DC3, constructed in 1988, **approved in 2016 for modification**, with a maximum capacity of 295 pounds of wood per hour, using an integral ~~cyclone~~ **bag filter system** for particulate control, and exhausting ~~to one (1) stack, identified as Stack 10~~ **indoors**.

(4) Shop 4, identified as DC4, constructed in 2001, **approved in 2016 for modification**, with a maximum capacity of ~~400~~ **295** pounds of wood per hour, using an integral bag filter system for particulate control, and exhausting ~~inside the building and then to general ventilation~~ **indoors**.

...

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

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

D.2.1 Particulate Matter PM, PM₁₀ and PM2.5 Limitations [326 IAC 2-2]

In order to render the 326 IAC 2-2 (PSD) requirements not applicable, the PM, PM10 and PM2.5 emissions shall not exceed the emissions limits listed in the table below:

Facility	PM limit (lb/hr)	PM10 limit (lb/hr)	PM2.5 limit (lb/hr)
Woodworking shop 1	5.53	5.53	5.53
Woodworking shop 2	1.76	1.76	1.76
Woodworking shop 3	1.14	1.14	1.14
Woodworking shop 4	0.551	0.551	0.551

Compliance with this limitation, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 not applicable.

D.2.21 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
DC1	Woodworking Shop 1	1.57	5.53
DC2	Woodworking Shop 2	0.28	1.76
DC3	Woodworking Shop 3	0.15	1.14
DC4	Woodworking Shop 4	0.05	0.55

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:

$$E = 4.10 \cdot P^{0.67}$$

where E = rate of emission in pounds per hour
and
P = process weight rate in tons per hour

D.2.32 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.43 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the ~~bag filter and cyclones~~ **cyclone and bag filters** for particulate control shall be in operation at all times when the associated ~~and control emissions~~ from the ~~woodworking shops~~ **Shop 1 (DC1)** and insignificant woodworking operations **at all times when Shop 1 (DC1) and insignificant woodworking facilities** are in operation and ~~exhausting to the atmosphere.~~
- (b) In order to assure **Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4)** are not subject to the requirements of **326 IAC 6-3-2**, the integral bag filter systems for particulate control shall be in operation and control emissions from **Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4)** at all times **Shop 2 (DC2), Shop 3 (DC3), and Shop 4 (DC4)** are in operation.

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

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

D.2.5 Visible Emissions Notations

- (a) ~~Visible emission notations of the woodworking shops exhausts (Stacks 9 and 10) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or 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.~~

D.2.64 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. **The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit.** Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). ~~Section C - Response to Excursions or 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.~~

D.2.75 Broken Bag or Failure or Failed Bag Detection

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

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

D.2.6 Baghouse and Cyclone Inspections

The Permittee shall perform semi-annual inspections of the cyclone and bag filters controlling particulate from the woodworking shops and insignificant woodworking operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.87 Record Keeping Requirements

- (a) ~~To document the compliance status with Condition D.2.5, the Permittee shall maintain records of visible emission notations taken daily of woodworking shop stacks exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notations (i.e. the process did not operate that day)~~ **To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the dates and results of the inspections.**
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

Section D.3 - Revisions

- (a) IDEM, OAQ revised Condition D.3.1 - Particulate Emission Limitations to include applicable requirements for source of indirect heating subject to 326 IAC 6-2-4.
- (b) Section D.3 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section D.3 has been revised as follows:

SECTION D.3 FACILITY EMISSIONS UNIT OPERATION CONDITIONS

Facility Emissions Unit Description [326 IAC 2-7-5(15)]:
Insignificant activities:
(b) Natural gas-fired combustion sources with heat input equal to or less than ten million

(10,000,000) Btu per hour:

~~(1) One (1) natural gas-fired boiler with a maximum heat input capacity of 0.439 MMBtu/hr.~~

(2) One (1) natural gas-fired air make-up unit, identified as AM-1, permitted in 2000, with a maximum heat input capacity of 4.90 MMBtu/hr, exhausting to stack HSV1.

(3) One (1) natural gas-fired air make-up unit, identified as AM-2, permitted in 2000, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV2.

(4) One (1) natural gas-fired air make-up units, identified as AM-3, permitted in 2003, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack HSV3.

(5) Six (6) natural gas-fired thermo cycler heaters, identified as H-33, H-34, H-35, H-36, H-37, and H-38, permitted in 2000, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting to stacks HSV4 - HSV9.

(6) One (1) natural gas-fired thermo cycler heater, identified as H-43, permitted in 2016, with a maximum heat input capacity of 0.50 MMBtu/hr, exhausting to stack HSV10.

(7) One (1) natural gas-fired thermo cycler heater, identified as H-44, permitted in 2012, with a maximum heat input capacity of 0.40 MMBtu/hr, exhausting to stack HSV11.

(8) Two (2) natural gas fueled Thermo-Cyclers, identified as H-79-1 and H-79-2, permitted in 2016, with a maximum heat input capacity of 0.58 MMBtu/hr, each, using no controls, and exhausting to stack HSV12 and HSV13, respectively.

(9) One (1) natural gas fueled office furnace, identified as H-79-3, permitted in 2016, with a maximum heat input capacity of 0.093 MMBtu/hr, using no controls, and exhausting to stack HSV14.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3] Emission Limitations [326 IAC 6-2-4]

~~Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the natural gas fired boiler shall not exceed eight tenths (0.8) pounds per million British thermal units (MMBTU).~~

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Air make up unit	AM-1	0.57
Air make up unit	AM-2	0.57
Air make up unit	AM-3	0.55
Thermo-Cycler	H-33 - H-38	0.57
Thermo-Cycler	H-44	0.55
Thermo-Cycler	H-43	0.55
Thermo-Cycler	H-79-1, H-79-2	0.55
Office furnace	H-79-3	0.55

...

Section E.1 - Revisions

Section E.1 has been deleted because the emissions units subject to the NESHAP were removed. Subsequent sections were renumbered

Section E.1 has been revised as follows:

~~SECTION E.1 NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS
 (NESHAP) REQUIREMENTS~~

~~Emissions Unit Operation:~~

~~(a) One (1) surface coating operation for the coating of wood substrates, identified as EU-A, constructed in 1964, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using HVLP and airless spray methods of application, and exhausting to four (4) stacks, identified as Stacks 1, 2, 3, and 4.~~

~~(b) One (1) paint spray coating operation for the coating of wood and fiberglass substrates, identified as EU-B, constructed in 1968, supporting a maximum source capacity of coating parts for 4.5 vehicles per hour, using dry filters as overspray control, using the air atomized spray method of application, and exhausting to one (1) stack, identified as Stack 7.~~

~~Under 40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants for Source Category: Paint Striping and Miscellaneous Surface Coating Operations at Area Sources, EU-A and EU-B are considered affected sources.~~

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

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

- ~~(a) Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, except as otherwise specified in 40 CFR 63, Subpart HHHHHH.~~
- ~~(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports 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 46204-2254~~

~~E.1.2 National Emission Standards (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH] [326 IAC 20-8-1]~~

~~The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 20-8-1, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH:~~

Applicable portions of the NESHAP are the following:

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

Section E.2 - Revisions

- (a) Section E.2 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."
- (b) IDEM renumbered Section E.2 because the preceding section was deleted.

Section E.2 has been revised as follows:

SECTION E.21 FACILITY OPERATION CONDITIONS NESHAP

Facility **Emissions Unit** Description [326 IAC 2-7-5(15)]:

...

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

~~National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements: Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC] [326 IAC 2-8-4(1)]~~

~~E.21.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

- ~~(a) Pursuant to 40 CFR 63.340(b) **63.1**, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-8-21, for the gasoline fuel transfer and dispensing operation CFR Part 63, Subpart CCCCCC in accordance with the schedule **emission unit listed above, except as otherwise specified** in 40 CFR 63, Subpart CCCCCC.~~
- ~~(b) ...~~

E.21.2 National Emissions Standards for Hazardous Air Pollutants for **Source Category: Gasoline Dispensing Facilities NESHAP** [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B **to the operating permit**) ~~which are incorporated by reference as 326 IAC 20-82 for the gasoline fuel transfer and dispensing operation for the emission unit listed above:~~

- (1) 40 CFR 63. 11110
- (2) 40 CFR 63. 11111(a)(b)(e)(f)
- ~~(3) 40 CFR 63. 11112(a)(d)~~
- ~~(4) 40 CFR 63. 11113(b)(c)~~
- ~~(5) 40 CFR 63. 11116~~
- ~~(6) 40 CFR 63. 11130~~
- ~~(7) 40 CFR 63. 11131~~
- ~~(8) 40 CFR 63. 11132~~
- ~~(9) Table 3~~
- (3) 40 CFR 63. 11111(b)**
- (4) 40 CFR 63. 11111(e)**
- (5) 40 CFR 63. 11111(f)**
- (6) 40 CFR 63. 11112(a)**
- (7) 40 CFR 63. 11112(d)**
- (8) 40 CFR 63. 11113(b)**
- (9) 40 CFR 63. 11113(c)**
- (10) 40 CFR 63. 11116**
- (11) 40 CFR 63. 11130**
- (12) 40 CFR 63. 11131**
- (13) 40 CFR 63. 11132**
- (14) Table 3 to Subpart CCCCCC of Part 63**

Reporting Forms - Revisions

- (a) 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule. In addition, the existing rule cite is being corrected to refer to the FESOP rules.
- (b) IDEM, OAQ deleted the FESOP Quarterly Report forms for HAPs because the HAP limits were removed from the permit.
- (c) IDEM, OAQ deleted the FESOP Quarterly Report for the Hot Melt Glue operation because the emissions unit was removed.

Reporting Forms have been revised as follows:

...

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: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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 2-8-12.

...

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

~~FESOP Quarterly Report~~

~~Source Name: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007
Facility: The coating operations and hot melt glue operation
Parameter: Single HAP
Limit: less than 9.89 tons per twelve consecutive month period~~

~~YEAR: _____~~

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

~~_____ 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: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007
Facility: The coating operations and hot melt glue operation
Parameter: Combined HAPs
Limit: less than 24.89 tons per twelve consecutive month period

YEAR: _____

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

- 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: Jayco Inc. - Topeka
Source Address: 536 W. Michigan Street, Topeka, Indiana 46571
FESOP Permit No.: F087-30645-00007
Facility: The hot melt glue operation
Parameter: VOG
Limit: less than 25 tons per twelve consecutive month period

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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 December 16, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 087-36637-00007. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Doug Logan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 ¹	SO ₂	NOx	VOC	CO	Total HAPs
Dip stain coating DS1	--	--	--	--	--	6.35	--	6.82E-02
Line 54	--	--	--	--	--	43.49	--	1.27
Line 57	--	--	--	--	--	20.47	--	0.60
Line 58	--	--	--	--	--	28.14	--	0.82
Touchup Booths SB1 & SB2	0.34	0.34	0.34	--	--	3.94	--	0.96
Line 49	--	--	--	--	--	7.95	--	0.15
Lamination	--	--	--	--	--	24.98	--	0.57
Woodworking ²	5.87	5.87	5.87	--	--	--	--	--
Natural gas combustion	0.11	0.46	0.46	3.62E-02	6.03	0.33	5.07	0.11
Total Not Including Fugitives³	6.32	6.66	6.66	3.62E-02	6.03	135.65	5.07	4.56
<u>Fugitive Emissions</u>								
Paved roads	0.16	3.26E-02	8.01E-03	--	--	--	--	--

Potential to Emit after Issuance ⁴ (tons/yr)								
Emission Unit	PM	PM10	PM2.5 ¹	SO ₂	NOx	VOC	CO	Total HAPs
Dip stain coating DS1	--	--	--	--	--	94.67	--	6.82E-02
Line 54	--	--	--	--	--		--	1.27
Line 57	--	--	--	--	--		--	0.60
Line 58	--	--	--	--	--		--	0.82
Touchup Booths SB1 & SB2	0.34	0.34	0.34	--	--		--	0.96
Line 49	--	--	--	--	--		--	0.15
Lamination	--	--	--	--	--		--	0.57
Woodworking ²	5.87	5.87	5.87	--	--	--	--	--
Natural gas combustion	0.11	0.46	0.46	3.62E-02	6.03	0.33	5.07	0.11
Total Not Including Fugitives³	6.32	6.66	6.66	3.62E-02	6.03	95.00	5.07	4.56
<u>Fugitive Emissions</u>								
Paved roads	0.16	3.26E-02	8.01E-03	--	--	--	--	--

Notes:

1. PM2.5 listed is direct PM2.5
2. Potential to emit for woodworking is determined after controls
3. The source is not in one of the 28 source categories and there are no applicable NSPS that were in effect before August 7, 1980, so fugitive emissions are not considered for Part 70 and PSD applicability.
4. Shaded cells indicate where limits are included

Appendix A: Emissions Calculations
SPR Summary Sheet

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

Uncontrolled Potential to Emit of Modified Units Before this Revision ¹ (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs
Surface Coating- EU-A, EU-B, EU-C, EU-D and EU-E	84.56	84.56	84.56	0	0	68.23	0	34.86
Repair Booths, RB3 & RB4	0.34	0.34	0.34	--	--	3.94	--	0.96
Woodworking DC-2	0.45	0.45	0.45	--	--	--	--	--
Woodworking DC-3	0.45	0.45	0.45	--	--	--	--	--
Woodworking DC-4	0.27	0.27	0.27	--	--	--	--	--
Total	86.07	86.07	86.07	--	--	72.16	--	35.82

Uncontrolled Potential to Emit of Modified Units After this Revision (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs
Dip stain coating DS1	--	--	--	--	--	6.35	--	6.82E-02
Line 54	--	--	--	--	--	43.49	--	1.27
Line 57	--	--	--	--	--	20.47	--	0.60
Line 58	--	--	--	--	--	28.14	--	0.82
Touchup Booths, SB1 & SB2	0.34	0.34	0.34	--	--	3.94	--	9.60E-01
Woodworking DC-2	0.27	0.27	0.27	--	--	--	--	--
Woodworking DC-3	0.27	0.27	0.27	--	--	--	--	--
Woodworking DC-4	0.27	0.27	0.27	--	--	--	--	--
Total	1.15	1.15	1.15	--	--	102.39	--	3.73

Increased Potential to Emit of Modified Units ^{3,4} (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs
Dip stain coating DS1				--	--		--	
Line 54	0	0	0	--	--	30.22	--	0
Line 57				--	--		--	
Line 58				--	--		--	
Touchup Booths, SB1 & SB2	0	0	0	--	--	0	--	0
Woodworking DC-2	0	0	0	--	--	--	--	--
Woodworking DC-3	0	0	0	--	--	--	--	--
Woodworking DC-4	0	0	0	--	--	--	--	--
Total	0	0	0	--	--	30.22	--	0

Uncontrolled Potential to Emit of New Units (tons/year)								
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs
Line 49	0	0	0	--	--	7.95	--	0.15
Lamination	--	--	--	--	--	24.98	--	0.57
Thermo Cycler H-43	4.08E-03	1.63E-02	1.63E-02	1.29E-03	0.21	1.18E-02	0.18	4.05E-03
H-791, H-792, H-793	1.02E-02	4.09E-02	4.09E-02	3.23E-03	0.54	2.96E-02	0.45	1.02E-02
Total	1.43E-02	5.72E-02	5.72E-02	4.52E-03	0.75	32.97	0.63	0.73

Potential to Emit of this Revision (tons/yr)								
Emission Unit	PM	PM10	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs
Increase in PTE of the modified units	0	0	0	--	--	30.22	--	0
PTE of the new units	1.43E-02	5.72E-02	5.72E-02	4.52E-03	0.75	32.97	0.63	0.73
Total	1.43E-02	5.72E-02	5.72E-02	4.52E-03	0.75	63.19	0.63	0.73

Notes:

- Source: TSD App A, FESOP No. 087-30645-00007
- PM2.5 listed is direct PM2.5
- Greater of 0 or PTE After - PTE Before
- The increase in PTE should be shown for each modified unit (DS1, Line 54, Line 57, and Line 58) but the PTE before this revision for each unit cannot be determined. TSD App A of F087-30645-00007 determined the combined PTE of five units - EU-A, EU-B, and EU-E, now removed; EU-C, now DS1.; and EU-D, now identified as Lines 54, 57, and 58. Therefore, the increased PTE of the modified units is determined relative to the combined values for EU's -A through -E in F087-30645-00007. This presentation does not affect the determination of revision level because the VOC PTE of the new units is high enough to require a Significant Permit Revision.

**Appendix A: Emissions Calculations
From Surface Coating Operations
Dip Stain Coating (DS1)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Nanochem	Concord Cherry Stain	6.86	97.29%	65.64%	31.65%	53.99%	9.32%	0.0703	9.50	16.03	4.72	2.17	1.45	34.80	6.35	0.00	23.30	manual	100%	Wood
	Acetone	6.69	100.00%	100.00%	0.00%	100.00%	0.00%	0.0029	9.50	0.66	0	0	0	0	0	0	0	manual	100%	Wood
Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										0	sum of products shown in shaded cells.									
Total Potential to Emit		Add worst case coating to all solvents										1.45	34.80	6.35	0.00					

- Notes*
1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
Nanochem	Concord Cherry Stain	6.86	0.0703	9.50	0.02%	0.26%	0.06%	4.01E-03	5.22E-02	1.20E-02	6.82E-02
	Acetone	6.69	0.0029	9.50	0%	0%	0%	0	0	0	0
Total								4.01E-03	5.22E-02	1.20E-02	6.82E-02

EB - ethylbenzene

**Appendix A: Emissions Calculations
From Surface Coating Operations
Assembly Line Operations (L-54)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Russell Products	RPI-676	5.84	54.75%	40.00%	14.75%	17.70%	56.56%	0.0093	4.25	0.94	1.05	0.86	0.03	0.81	0.15	0.00	1.52	Non-atomized spray ³	100%	Plastic
DAP	Gen Purpose	10.85	4.00%	0.00%	4.00%	0.00%	94.10%	0.0013	4.25	0.13	0.43	0.43	0.00	0.06	0.01	0.00	0.46	manual	100%	Plastic
Geocel Corporation	Silicone Sealant	9.84	4.00%	0.00%	4.00%	0.00%	94.65%	0.1413	4.25	14.41	0.39	0.39	0.24	5.67	1.03	0.00	0.42	manual	100%	Wood/Plastic
Bondaflex	Silicone Sealant	7.92	9.00%	0.00%	9.00%	0.00%	90.32%	0.1413	4.25	14.41	0.71	0.71	0.43	10.27	1.87	0.00	0.79	manual	100%	Wood/Plastic
Franklin	Thin Spread Adhesive	8.51	10.00%	0.00%	10.00%	0.00%	88.44%	0.1125	4.25	11.48	0.85	0.85	0.41	9.77	1.78	0.00	0.96	manual	100%	Wood/Plastic
Illbruck	Universal Foam Sealant	8.42	20.00%	0.00%	20.00%	0.00%	77.11%	0.1125	4.25	11.48	1.68	1.68	0.81	19.33	3.53	0.00	2.18	manual	100%	Wood/Plastic
Staybond	Anti Wicking 626 Black	9.17	99.12%	99.12%	0.00%	99.00%	1.00%	0.1125	4.25	11.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Henkel Corporation	Adhesive/Sealant	7.74	35.00%	0.00%	35.00%	0.00%	63.19%	0.3625	4.25	36.98	2.71	2.71	4.17	100.17	18.28	0.00	4.29	Non-atomized spray ³	100%	Wood/Plastic
Alpha Systems	1021 Seam Sealant	11.18	22.00%	0.00%	22.00%	0.00%	66.58%	0.3625	4.25	36.98	2.46	2.46	3.79	90.94	16.60	0.00	3.69	manual	100%	Wood/Plastic
Alpha Systems	8011 WB Sealant	8.35	0.00%	0.00%	0.00%	0.00%	100.00%	0.1125	4.25	11.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Oatey	Pipe Joint Cement	7.34	80.00%	20.00%	60.00%	17.60%	20.22%	0.0029	4.25	0.29	5.34	4.40	0.05	1.29	0.24	0.00	21.78	manual	100%	Plastic
Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										0	sum of products shown in shaded cells.									
Total Potential to Emit												9.93	238.31	43.49	0.00					

Notes

1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
3. IDEM, OAO has determined that application of Russell Products RPI-676 adhesive and Henkel Adhesive/Sealant in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions.

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % n-Hexane	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	n-Hexane Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
Russell Products	RPI-676	5.84	0.0093	4.25	0%	20.00%	0%	0%	0	0.20	0	0	2.01E-01
DAP	Gen Purpose	10.85	0.0013	4.25	0%	0%	0%	0%	0	0	0	0	0
Geocel Corporation	Silicone Sealant	9.84	0.1413	4.25	0%	0%	0%	0%	0	0	0	0	0
Bondaflex	Silicone Sealant	7.92	0.1413	4.25	0%	0%	4.90%	0%	0	0	1.020405425	0	1.02040542
Franklin	Thin Spread Adhesive	8.51	0.1125	4.25	0.10%	0%	0.10%	0.10%	0.01782154	0	0.02	0.017821536	0.05
Illbruck	Universal Foam Sealant	8.42	0.1125	4.25	0%	0%	0%	0%	0	0	0.00E+00	0	0.00E+00
Staybond	Anti Wicking 626 Black	9.17	0.1125	4.25	0%	0%	0%	0%	0	0	0	0	0
Henkel Corporation	Adhesive/Sealant	7.74	0.3625	4.25	0%	0%	0%	0%	0.00	0	0.00E+00	0.00	0.00
Alpha Systems	1021 Seam Sealant	11.18	0.3625	4.25	0%	0%	0%	0%	0	0	0	0	0
Oatey	Pipe Joint Cement	7.34	0.0029	4.25	0%	0%	0%	0%	0	0	0	0	0
Total									0.02	0.20	1.04	0.02	1.27

EB - ethylbenzene

3. Worst case HAP fractions from Table 4 to 40 CFR 63, Subpart M, aliphatic solvents (petroleum oil 5%)

**Appendix A: Emissions Calculations
From Surface Coating Operations
Assembly Line Operations (L-57)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Russell Products	RPI-676	5.84	54.75%	40.00%	14.75%	17.70%	56.56%	0.0093	2.00	0.444	1.05	0.86	0.02	0.38	0.07	0.00	1.52	Non-atomized spray ³	100%	Plastic
DAP	Gen Purpose	10.85	4.00%	0.00%	4.00%	0.00%	94.10%	0.0013	2.00	0.060	0.43	0.43	0.00	0.03	0.00	0.00	0.46	manual	100%	Plastic
Geocel Corporation	Silicone Sealant	9.84	4.00%	0.00%	4.00%	0.00%	94.65%	0.1413	2.00	6.780	0.39	0.39	0.11	2.67	0.49	0.00	0.42	manual	100%	Wood/Plastic
Bondaflex	Silicone Sealant	7.92	9.00%	0.00%	9.00%	0.00%	90.32%	0.1413	2.00	6.780	0.71	0.71	0.20	4.83	0.88	0.00	0.79	manual	100%	Wood/Plastic
Franklin	Thin Spread Adhesive	8.51	10.00%	0.00%	10.00%	0.00%	88.44%	0.1125	2.00	5.400	0.85	0.85	0.19	4.60	0.84	0.00	0.96	manual	100%	Wood/Plastic
Illbruck	Universal Foam Sealant	8.42	20.00%	0.00%	20.00%	0.00%	77.11%	0.1125	2.00	5.400	1.68	1.68	0.38	9.10	1.66	0.00	2.18	manual	100%	Wood/Plastic
Staybond	Anti Wicking 626 Black	9.17	99.12%	99.12%	0.00%	99.00%	1.00%	0.1125	2.00	5.400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Henkel Corporation	Adhesive/Sealant	7.74	35.00%	0.00%	35.00%	0.00%	63.19%	0.3625	2.00	17.400	2.71	2.71	1.96	47.14	8.60	0.00	4.29	Non-atomized spray ³	100%	Wood/Plastic
Alpha Systems	1021 Seam Sealant	11.18	22.00%	0.00%	22.00%	0.00%	66.58%	0.3625	2.00	17.400	2.46	2.46	1.78	42.80	7.81	0.00	3.69	manual	100%	Wood/Plastic
Alpha Systems	8011 WB Sealant	8.35	0.00%	0.00%	0.00%	0.00%	100.00%	0.1125	2.00	5.400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Oatey	Pipe Joint Cement	7.34	80.00%	20.00%	60.00%	17.60%	20.22%	0.0029	2.00	0.138	5.34	4.40	0.03	0.61	0.11	0.00	21.78	manual	100%	Plastic

Total Potential to Emit **Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)** 0 sum of products shown in shaded cells. **4.67** **112.14** **20.47** **0.00**
Add worst case coating to all solvents

- Notes**
1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
3. IDEM, OAO has determined that application of Russell Products RPI-676 adhesive and Henkel Adhesive/Sealant in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions.

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % n-Hexane	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	n-Hexane Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
Russell Products	RPI-676	5.84	0.0093	2.00	0%	20.00%	0%	0%	0	9.46E-02	0	0	9.46E-02
DAP	Gen Purpose	10.85	0.0013	2.00	0%	0%	0%	0%	0	0	0	0	0
Geocel Corporation	Silicone Sealant	9.84	0.1413	2.00	0%	0%	0%	0%	0	0	0	0	0
Bondaflex	Silicone Sealant	7.92	0.1413	2.00	0%	0%	4.90%	0%	0	0	0.480190788	0	0.48019079
Franklin	Thin Spread Adhesive	8.51	0.1125	2.00	0.10%	0%	0.10%	0.10%	0.00838661	0	0.01	0.008386605	0.03
Illbruck	Universal Foam Sealant	8.42	0.1125	2.00	0%	0%	0%	0%	0	0	0.00	0	0.00E+00
Staybond	Anti Wicking 626 Black	9.17	0.1125	2.00	0%	0%	0%	0%	0	0	0	0	0
Henkel Corporation	Adhesive/Sealant	7.74	0.3625	2.00	0%	0%	0%	0%	0.00	0	0.00E+00	0.00	0.00
Alpha Systems	1021 Seam Sealant	11.18	0.3625	2.00	0%	0%	0%	0%	0	0	0	0	0
Oatey	Pipe Joint Cement	7.34	0.0029	2.00	0%	0%	0%	0%	0	0	0	0	0
Total									0.01	9.46E-02	0.49	0.01	0.60

EB - ethylbenzene
3. Worst case HAP fractions from Table 4 to 40 CFR 63, Subpart M, aliphatic solvents (petroleum oil 5%)

**Appendix A: Emissions Calculations
From Surface Coating Operations
Assembly Line Operations (L-58)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Russell Products	RPI-676	5.84	54.75%	40.00%	14.75%	17.70%	56.56%	0.0093	2.75	0.61	1.05	0.86	0.02	0.53	0.10	0.00	1.52	Non-atomized spray ³	100%	Plastic
DAP	Gen Purpose	10.85	4.00%	0.00%	4.00%	0.00%	94.10%	0.0013	2.75	8.28E-02	0.43	0.43	0.00	0.04	0.01	0.00	0.46	manual	100%	Plastic
Geocel Corporation	Silicone Sealant	9.84	4.00%	0.00%	4.00%	0.00%	94.65%	0.1413	2.75	9.32	0.39	0.39	0.15	3.67	0.67	0.00	0.42	manual	100%	Wood/Plastic
Bondaflex	Silicone Sealant	7.92	9.00%	0.00%	9.00%	0.00%	90.32%	0.1413	2.75	9.32	0.71	0.71	0.28	6.65	1.21	0.00	0.79	manual	100%	Wood/Plastic
Franklin	Thin Spread Adhesive	8.51	10.00%	0.00%	10.00%	0.00%	88.44%	0.1125	2.75	7.43	0.85	0.85	0.26	6.32	1.15	0.00	0.96	manual	100%	Wood/Plastic
Illbruck	Universal Foam Sealant	8.42	20.00%	0.00%	20.00%	0.00%	77.11%	0.1125	2.75	7.43	1.68	1.68	0.52	12.51	2.28	0.00	2.18	manual	100%	Wood/Plastic
Staybond	Anti Wicking 626 Black	9.17	99.12%	99.12%	0.00%	99.00%	1.00%	0.1125	2.75	7.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Henkel Corporation	Adhesive/Sealant	7.74	35.00%	0.00%	35.00%	0.00%	63.19%	0.3625	2.75	23.93	2.71	2.71	2.70	64.81	11.83	0.00	4.29	Non-atomized spray ³	100%	Wood/Plastic
Alpha Systems	1021 Seam Sealant	11.18	22.00%	0.00%	22.00%	0.00%	66.58%	0.3625	2.75	23.93	2.46	2.46	2.45	58.85	10.74	0.00	3.69	manual	100%	Wood/Plastic
Alpha Systems	8011 WB Sealant	8.35	0.00%	0.00%	0.00%	0.00%	100.00%	0.1125	2.75	7.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Oatey	Pipe Joint Cement	7.34	80.00%	20.00%	60.00%	17.60%	20.22%	0.0029	2.75	0.19	5.34	4.40	0.03	0.84	0.15	0.00	21.78	manual	100%	Plastic
Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										0	sum of products shown in shaded cells.									
Total Potential to Emit											6.42	154.20	28.14	0.00						

Notes

1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
3. IDEM, OAO has determined that application of Russell Products RPI-676 adhesive and Henkel Adhesive/Sealant in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions.

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % n-Hexane	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	n-Hexane Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
Russell Products	RPI-676	5.84	0.0093	2.75	0%	20.00%	0%	0%	0	1.30E-01	0	0	1.30E-01
DAP	Gen Purpose	10.85	0.0013	2.75	0%	0%	0%	0%	0	0	0	0	0
Geocel Corporation	Silicone Sealant	9.84	0.1413	2.75	0%	0%	0%	0%	0	0	0	0	0
Bondaflex	Silicone Sealant	7.92	0.1413	2.75	0%	0%	4.90%	0%	0	0	0.660262334	0	0.660262333
Franklin	Thin Spread Adhesive	8.51	0.1125	2.75	0.10%	0%	0.10%	0.10%	0.01153158	0	0.01	0.011531582	0.03
Illbruck	Universal Foam Sealant	8.42	0.1125	2.75	0%	0%	0%	0%	0	0	0.00	0	0.00
Staybond	Anti Wicking 626 Black	9.17	0.1125	2.75	0%	0%	0%	0%	0	0	0	0	0
Henkel Corporation	Adhesive/Sealant	7.74	0.3625	2.75	0%	0%	0%	0%	0.00	0	0.00	0.00	0.00
Alpha Systems	1021 Seam Sealant	11.18	0.3625	2.75	0%	0%	0%	0%	0	0	0	0	0
Oatey	Pipe Joint Cement	7.34	0.0029	2.75	0%	0%	0%	0%	0	0	0	0	0
Total									0.01	1.30E-01	0.67	0.01	0.82

EB - ethylbenzene

3. Worst case HAP fractions from Table 4 to 40 CFR 63, Subpart M, aliphatic solvents (petroleum oil 5%)

**Appendix A: Emissions Calculations
From Surface Coating Operations
Touchup Booths (SB-1 & SB-2)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ¹	Transfer Efficiency
10001 Sherwin Williams	Aerosol - Enamel- Royal Blue - ColorTouch	5.84	88.00%	23.23%	64.77%	20.56%	30.17%	0.0003	4.5	0.03	4.76	3.78	0.01	0.12	0.02	0.00	12.54	aerosol can	50%
4402 Sherwin Williams	Aerosol - Gen Purpose - Gloss Black - Work Day	5.80	89.00%	27.08%	61.92%	23.80%	29.86%	0.0414	4.5	4.47	4.71	3.59	0.67	16.06	2.93	0.26	12.03	aerosol can	50%
10010 Sherwin Williams	Aerosol-Primer-Gray-ColorTouch	6.09	82.10%	27.06%	55.04%	24.97%	32.07%	0.0003	4.5	0.03	4.47	3.35	0.00	0.11	0.02	0.00	10.45	aerosol can	50%
AM800 BASF	Aerosol-Primer-Spot Prime-Aero-Max	6.90	79.71%	8.70%	71.01%	10.91%	25.27%	0.0008	4.5	0.09	5.50	4.90	0.02	0.42	0.08	0.01	19.39	aerosol can	50%
NLR Bases BASF	Basecoats	8.83	69.08%	0.00%	69.08%	0.00%	17.12%	0.0006	4.5	0.06	6.10	6.10	0.02	0.37	0.07	0.01	35.63	HVLP	75%
7601S DuPont	Blender-Chromaclear	7.18	96.10%	0.00%	96.10%	0.00%	6.25%	0.0018	4.5	0.19	6.90	6.90	0.06	1.34	0.24	0.00	110.40	HVLP	75%
DC76NR BASF	Clearcoat - Diamont-Turbo Clear	7.58	64.64%	6.60%	58.04%	10.01%	33.43%	0.0023	4.5	0.25	4.89	4.40	0.05	1.09	0.20	0.03	13.16	HVLP	75%
LH200 BASF	Hardener- Acrylic - Repair Limco 1-2-3-4	8.92	28.03%	0.00%	28.03%	0.00%	66.03%	0.0005	4.5	0.05	2.50	2.50	0.01	0.14	0.02	0.02	3.79	HVLP	75%
352-500 BASF	Primer - Spot Blender Reducer - Glasruit	7.60	98.66%	0.00%	98.66%	0.00%	1.34%	0.0001	4.5	0.01	7.50	7.50	0.00	0.08	0.01	0.00	559.56	HVLP	75%
UR50 BASF	Reducer-Medium Temp - Universal-Diamont	6.59	94.10%	1.52%	92.58%	2.00%	15.76%	0.0028	4.5	0.30	6.23	6.10	0.08	1.84	0.34	0.01	38.71	HVLP	75%
Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										0.87	sum of products shown in shaded cells.								
Total Potential to Emit												0.90	21.58	3.94	0.34				

Add worst case coating to all solvents

Notes

1. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % GE	Weight % MIBK	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	GE Emissions (tons/yr)	MIBK Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
10001 Sherwin Williams	Aerosol - Enamel- Royal Blue - ColorTouch	5.84	0.0003	4.5	0%	0%	0%	16.00%	0%	0	0	0	5.53E-03	0	5.53E-03
4402 Sherwin Williams	Aerosol - Gen Purpose - Gloss Black - Work Day	5.80	0.0414	4.5	0%	0%	0%	14.00%	0%	0	0	0	0.66	0	0.66
10010 Sherwin Williams	Aerosol-Primer-Gray-ColorTouch	6.09	0.0003	4.5	0.10%	0%	0%	10.00%	0%	3.60E-05	0	0	3.60E-03	0	3.64E-03
AM800 BASF	Aerosol-Primer-Spot Prime-Aero-Max	6.90	0.0008	4.5	0.30%	0%	0%	10.00%	1.00%	3.26E-04	0	0	1.09E-02	1.09E-03	1.23E-02
NLR Bases BASF	Basecoats	8.83	0.0006	4.5	10.00%	16%	46.00%	0%	35.00%	9.75E-03	1.56E-02	4.48E-02	0	3.41E-02	0.10
7601S DuPont	Blender-Chromaclear	7.18	0.0018	4.5	3.30%	0%	0%	28.00%	13.00%	8.41E-03	0	0	7.13E-02	3.31E-02	0.11
DC76NR BASF	Clearcoat - Diamont-Turbo Clear	7.58	0.0023	4.5	1.00%	0%	6.00%	0%	6.00%	3.44E-03	0	2.06E-02	0	2.06E-02	4.47E-02
LH200 BASF	Hardener- Acrylic - Repair Limco 1-2-3-4	8.92	0.0005	4.5	0%	0%	0%	13.00%	0%	0	0	0	1.14E-02	0.00	1.14E-02
352-500 BASF	Primer - Spot Blender Reducer - Glasruit	7.60	0.0001	4.5	0%	0%	0%	0%	15.00%	0	0	0	0	2.25E-03	2.25E-03
UR50 BASF	Reducer-Medium Temp - Universal-Diamont	6.59	0.0028	4.5	0%	0%	0%	0%	0%	0	0	0	0	0	0
Total										2.20E-02	1.56E-02	6.54E-02	0.77	9.12E-02	0.96

EB - ethylbenzene
 GE - glycol ethers
 MIBK - methyl isobutyl ketone

**Appendix A: Emissions Calculations
From Surface Coating Operations
Assembly Line Operations (L-49)**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Russell Products	RPI-676	5.84	54.75%	40.00%	14.75%	17.70%	56.56%	0.0093	0.50	0.111	1.05	0.86	0.00	0.10	0.02	0.00	1.52	Non-atomized spray ³	100%	Plastic
DAP	Gen Purpose	10.85	4.00%	0.00%	4.00%	0.00%	94.10%	0.0013	0.50	0.015	0.43	0.43	0.00	0.01	0.00	0.00	0.46	manual	100%	Plastic
Geocel Corporation	Silicone Sealant	9.84	4.00%	0.00%	4.00%	0.00%	94.65%	0.1413	0.50	1.695	0.39	0.39	0.03	0.67	0.12	0.00	0.42	manual	100%	Wood/Plastic
Bondaflex	Silicone Sealant	7.92	9.00%	0.00%	9.00%	0.00%	90.32%	0.1413	0.50	1.695	0.71	0.71	0.05	1.21	0.22	0.00	0.79	manual	100%	Wood/Plastic
Franklin	Thin Spread Adhesive	8.51	10.00%	0.00%	10.00%	0.00%	88.44%	0.1125	0.50	1.350	0.85	0.85	0.05	1.15	0.21	0.00	0.96	manual	100%	Wood/Plastic
Illbruck	Universal Foam Sealant	8.42	20.00%	0.00%	20.00%	0.00%	77.11%	0.1125	0.50	1.350	1.68	1.68	0.09	2.27	0.42	0.00	2.18	manual	100%	Wood/Plastic
Staybond	Anti Wicking 626 Black	9.17	99.12%	99.12%	0.00%	99.00%	1.00%	0.1125	0.50	1.350	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Henkel Corporation	Adhesive/Sealant	7.74	35.00%	0.00%	35.00%	0.00%	63.19%	0.6125	0.50	7.350	2.71	2.71	0.83	19.91	3.63	0.00	4.29	Non-atomized spray ³	100%	Wood/Plastic
Alpha Systems	1021 Seam Sealant	11.18	22.00%	0.00%	22.00%	0.00%	66.58%	0.6125	0.50	7.350	2.46	2.46	0.75	18.08	3.30	0.00	3.69	manual	100%	Wood/Plastic
Alpha Systems	8011 WB Sealant	8.35	0.00%	0.00%	0.00%	0.00%	100.00%	0.2375	0.50	2.850	0.00	0.00	0.00	0.00	0.00	0.00	0.00	manual	100%	Wood/Plastic
Oatey	Pipe Joint Cement	7.34	80.00%	20.00%	60.00%	17.60%	20.22%	0.0029	0.50	0.035	5.34	4.40	0.01	0.15	0.03	0.00	21.78	manual	100%	Plastic

Total Potential to Emit **Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)** 0 sum of products shown in shaded cells. **1.81** **43.54** **7.95** **0.00**

- Notes**
1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
 2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
 3. IDEM, OAO has determined that application of Russell Products RPI-676 adhesive and Henkel Adhesive/Sealant in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions.

METHODOLOGY

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

2. Hazardous Air Pollutants

Manufacturer	Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % EB	Weight % n-Hexane	Weight % Toluene	Weight % Xylenes	EB Emissions (tons/yr)	n-Hexane Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAPs
Russell Products	RPI-676	5.84	0.0093	0.50	0%	20.00%	0%	0%	0	2.37E-02	0	0	2.37E-02
DAP	Gen Purpose	10.85	0.0013	0.50	0%	0%	0%	0%	0	0	0	0	0
Geocel Corporation	Silicone Sealant	9.84	0.1413	0.50	0%	0%	0%	0%	0	0	0	0	0
Bondaflex	Silicone Sealant	7.92	0.1413	0.50	0%	0%	4.90%	0%	0	0	0.12	0	0.12
Franklin	Thin Spread Adhesive	8.51	0.1125	0.50	0.10%	0%	0.10%	0.10%	2.10E-03	0	2.10E-03	2.10E-03	6.29E-03
Illbruck	Universal Foam Sealant	8.42	0.1125	0.50	0%	0%	0%	0%	0	0	0	0	0
Staybond	Anti Wicking 626 Black	9.17	0.1125	0.50	0%	0%	0%	0%	0	0	0	0	0
Henkel Corporation	Adhesive/Sealant	7.74	0.6125	0.50	0%	0%	0%	0%	0	0	0	0	0
Alpha Systems	8011 WB Sealant	8.35	0.2375	0.50	0%	0%	0%	0%	0	0	0	0	0
Oatey	Pipe Joint Cement	7.34	0.0029	0.50	0%	0%	0%	0%	0	0	0	0	0
Total									2.10E-03	2.37E-02	0.12	2.10E-03	0.15

- EB - ethylbenzene
 3. Worst case HAP fractions from Table 4 to 40 CFR 63, Subpart M, aliphatic solvents (hydrotreated heavy naphthenic distillates, 10%)

**Appendix: Emissions Calculations
from Surface Coating Operations
Laminators**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

1. VOC and PM

Process	Manufacturer	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Volume % Non-Volatiles ¹ (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons of Coating per Day (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Application Method ²	Transfer Efficiency	Substrate
Laminator 1	H.B. Fuller	Swiftbond 3U316-1N	10.00	5.00%	0.00%	5.00%	0.00%	93.21%	2.037	4.25	207.78	0.50	0.50	4.33	103.89	18.96	0	0.54	Manual	100%	Plastic/Wood
Laminator 2	H.B. Fuller	Swiftbond 9733	10.00	6.00%	0.00%	6.00%	0.00%	91.85%	0.286	8.00	54.99	0.60	0.60	1.37	32.99	6.02	0	0.65	Manual	100%	Plastic/Wood

Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)

Uncontrolled Potential VOC Emissions 0 sum of products shown in shaded cells. **5.70** **136.89** **24.98** **0**

- Notes:*
1. Volume % Solids calculated using an assumed density of 7.36 lb/gal for the volatile fraction
2. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings

2. Hazardous Air Pollutants

Process	Manufacturer	Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % EB ¹	Weight % MDI ²	Weight % Toluene ³	Weight % Xylenes ³	EB Emissions (tons/yr)	MDI Emissions ⁴ (tons/yr)	Toluene Emissions (tons/yr)	Xylenes Emissions (tons/yr)	Total HAP Emissions (ton/yr)
Laminator 1	H.B. Fuller	Swiftbond 3U316-1N	10.00	2.037	4.25	0.05%	30.00%	0.05%	0.05%	0.19	9.12E-07	0.19	0.19	0.57
Laminator 2	H.B. Fuller	Swiftbond 9733	10.00	0.286	8.00	0.00%	50.00%	0.00%	0.00%	0.00	2.49E-06	0.00	0.00	0.00

Uncontrolled Potential HAP Emissions **0.19** **3.40E-06** **0.19** **0.19** **0.57**

- Notes:*
1. Because the VOC component is a highly reactive compound and the coating is enclosed between layers of material, VOC emissions are considered equal to HAP emissions
2. SDS lists polyurethane and polymeric MDI (CASRN 9016-87-9). Under OSHA regulations, the manufacturer is not required to list component present in a concentration less than 1% by weight for compounds not identified as carcinogens. As a worst-case for VOC PTE, an MDI concentration of 1% is assumed, polymers are assumed non-volatile.
3. Worst case HAP fractions from Table 4 to 40 CFR 63, Subpart M, aliphatic solvents (petroleum oil 5%)
4. Calculated MDI/HAP emissions based on Center for the Polyurethanes Industry methodology cited below.

METHODOLOGY

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

MDI Methodology

Pure MDI is a solid at room temperature and has an extremely low vapor pressure (1.0 x 10⁻⁶ mm Hg @ 298.2 K). MDI is also a highly reactive chemical which readily undergoes a chemical reaction to form a non volatile polyurethane polymer. Therefore, the potential VOC/HAP emissions are estimated by engineering calculations utilizing physical and chemical properties and fundamental relationships, such as, Raoult's law, Henry's law, and the ideal gas law. The following formula, obtained from the cited reference, is used to estimate the potential MDI evaporative loss in a lamination process:

Appendix D, Equation 7.0, Calculating Emissions From Open Processes

$$W = 25.4 * VP_{MDI} * (M_{WV} / T_{proc}) * u^{0.78} * S_A * t_{TF} * K_{MDI}$$

- Where W = Evaporative Losses, g/day
 VP_{MDI} = MDI Vapor Pressure at process temperature, atm
 = 1.023E-05 mm Hg, Table A-1, Reporting Guidelines
 = 1.346E-08 atm
 M_{WV} = Molecular Weight
 = 250.26 g/g-mole
 T_{proc} = Process Temperature (Kelvin)
 = 77 °F (ambient conditions)
 = 298 K
 u = Airflow speed, m/s
 = 100 ft/min (assumed worst case for the work area)
 = 0.51 m/s
 S_A = Exposed Surface Area, m²/day
 worst-case: 750 ft²/unit
 Laminator 1 Laminator 2
 4.25 8 unit/hr
 3188 6000 ft²/hr
 S_A = 76,500 144,000 ft²/day
 = 7,107 13,378 m²/day
 t_{TF} = Tack Free Time, sec
 = 5.00 sec (default value)
 K_{MDI} = Vapor Pressure Adjustment Factor for MDI Concentration
 = 0.377 0.547 interpolated from Table B-1, Reporting Guidelines, 77°F
 Laminator 1 Laminator 2
 Then W = 2.27E-03 6.19E-03 g/day
 = 9.44E-05 2.58E-04 g/hr
 MDI PTE = 2.08E-07 5.68E-07 lb/hr
 = 9.12E-07 2.49E-06 tons/yr

METHODOLOGY REFERENCE

MDI Emissions Reporting Guidelines for the Polyurethanes Industry American Chemistry Council, Center for the Polyurethanes Industry, Washington, DC, May 2012

**Appendix A: Emissions Calculations
Particulate Emissions - Woodworking Operations
Units DC1, DC2, DC3 and DC4**

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

Emissions Unit	Process Weight Rate (lb/hr)	Control Efficiency (%)	Grain Loading per Actual Cubic Foot of Outlet Air (gr/acf)	Exhaust Air Flow Rate (acfm)	Potential to Emit PM/PM10/PM2.5				326 IAC 6-3-2 Allowable Emissions (lb/hr)
					Uncontrolled		After Controls		
					(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	
DC1	3130	99.0%	0.011711	11499	115.43	505.57	1.15	5.06	5.53
DC2	295	99.0%	0.002000	3600	6.17	27.03	0.06	0.27	1.14
DC3	295	99.0%	0.002000	3600	6.17	27.03	0.06	0.27	1.14
DC4	295	99.0%	0.002000	3600	6.17	27.03	0.06	0.27	1.14
Total					133.94	586.66	1.34	5.87	

Emissions Unit	Process Weight Rate (lb/hr)	Control Efficiency (%)	Grain Loading per Actual Cubic Foot of Outlet Air (gr/acf)	Exhaust Air Flow Rate (acfm)	Potential to Emit PM/PM10/PM2.5				326 IAC 6-3-2 Allowable Emissions (lb/hr)
					Uncontrolled		After Controls		
					(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	
Insig. Woodworking	300	90.0%	0.03	4000	10.3	45.1	1.03	4.51	1.15

ALLOWABLE RATE OF EMISSIONS

Total Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
3130	1.565	5.53
295	0.1475	1.14
295	0.1475	1.14
295	0.1475	1.14

Methodology

PM=PM10 = PM2.5

Note: In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. . (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before . consideration of the controls.

PTE Before Controls (tons/yr) = Process Weight Rate (lbs/hr) x Emission Factor (lbs/lb wood) x 8760 (hrs/yr) x 1 ton/2,000 lbs

PTE Before Controls (lbs/hr) = Process Weight Rate (lbs/hr) x Emission Factor (lbs/lb wood)

PTE After Controls (tons/yr) = PTE Before Controls (tons/yr) x (1 - Control Efficiency %)

PTE After Controls (lbs/hr) = PTE Before Controls (lbs/hr) x (1 - Control Efficiency %)

PTE (Insig. Woodworking) After Controls (tons/yr) = Air Flow Rate (acfm) x Grain Loading (gr/dscf) x 60 min/hr x 1 lb/7,000 gr x 8760 (hrs/yr) x 1 ton/2,000 lbs

PTE (Insig. Woodworking) Before Controls (tons/yr) = PTE After Controls (tons/yr) x 1/(1 - Control Efficiency %)

326 IAC 6-3-2 Allowable Emissions = 4.1 x Process Weight Rate (tons/hr)^0.67

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

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

Includes: Description	Unit ID	Quantity	Capacity (MMBtu/hr)		
			Unit	Total	
air make-up	AM-1	1	4.90	4.90	
air make-up	AM-2, AM-3	2	2.00	4.00	
thermo cycler heater	H-33 - H-38, H-43	7	0.50	3.50	
thermo cycler heater	H-44	1	0.40	0.40	
thermo cycler heater	H-79-1, H-79-2	2	0.58	1.16	
office furnace	H-79-3	1	0.093	0.09	
Total					14.05

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
14.05	1020	120.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.11	0.46	0.46	0.04	6.03	0.33	5.07

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
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	1.3E-04	7.2E-05	4.5E-03	0.11	2.1E-04	0.11

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
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	3.0E-05	6.6E-05	8.4E-05	2.3E-05	1.3E-04	3.3E-04
					Total HAPs	0.11
					Worst HAP	0.11

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Jayco, Inc. - Topeka
Source Address: 536 Michigan St, Topeka, IN 46571
FESOP SPR No.: 087-36627-00007
Reviewer: Doug Logan
Date: 4/5/2016

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	15.0	15.0	15.0	225.0	125	0.024	0.4	129.6
Vehicle (leaving plant) (one-way trip)	1.0	15.0	15.0	15.0	225.0	125	0.024	0.4	129.6
Total			30.0		450.0			0.7	259.2

Average Vehicle Weight Per Trip = 15.0 tons/trip
 Average Miles Per Trip = 0.02 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	1.377	0.275	0.0676	lb/mile
Mitigated Emission Factor, E_{ext} =	1.259	0.252	0.0618	lb/mile
Dust Control Efficiency =	0%	0%	0%	(source is not required to have a fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.09	0.02	0.00	0.08	0.02	0.00	0.08	0.02	0.00
Vehicle (leaving plant) (one-way trip)	0.09	0.02	0.00	0.08	0.02	0.00	0.08	0.02	0.00
Totals	0.18	0.04	0.01	0.16	0.03	0.01	0.16	0.03	0.01

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

May 4, 2016
Jayco, Inc. - Topeka
087-36627-00007

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 4, 2016

Mr. Ted Buchanan
Jayco, Inc. - Topeka
903 S Main Street
Middlebury, IN 46540

Re: Public Notice
Jayco, Inc. - Topeka
Permit Level: Significant Permit Revision
Permit Number: 087-36627-00007

Dear Mr. Buchanan:

Enclosed is a copy of your draft Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange News in LaGrange, Indiana publish the abbreviated version of the public notice no later than May 6, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the LaGrange Public Library- Topeka Branch, 133 N. Main Street in Topeka, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Doug Logan, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5328 or dial (317) 234-5328.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 4, 2016

To: LaGrange Public Library – Topeka Branch

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Jayco, Inc. - Topeka
Permit Number: 087-36627-00007

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 4, 2016

LaGrange News
PO Box 148
LaGrange, IN 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Jayco, Inc. - Topeka, LaGrange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than May 6, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Permit Revision
Permit Number: 087-36627-00007

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 5/4/2016 Javco, Inc. 087-36627-00007 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Ted Buchanan Javco, Inc. 903 S Main St Middlebury IN 46540 (Source CAATS)										
2		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
3		Topeka Town Council P.O. Box 127 Topeka IN 46571 (Local Official)										
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
7		LaGrange County Public Library - Topeka Branch 133 N. Main St. Topeka IN 46571 (Library)										
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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