PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Fairmont Homes, Inc.
502 South Oakland Avenue
Nappanee, Indiana 46550

and

Kustom Woodworking
401 East Lincoln
Nappanee, Indiana 46550

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.

Operation Permit No.: T039-6992-00509	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) . 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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary framed home manufacturing plant.

Responsible Official:	James F. Shea
Source Address:	Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address:	Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550 Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
SIC Code:	2451 and 2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

The following surface coating facilities:

(a) One (1) airless vapor barrier application system, coating a maximum capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(b) Two (2) flowcoating foam application systems coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(c) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(d) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 1C]

(e) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(f) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3 [Fairmont Homes - Building 5]

(g) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(h) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 5A]

(i) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(j) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(k) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(l) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 7A]

(m) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(n) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(o) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(p) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 12B]

(q) Two (2) airless paint application system, coating a maximum of 0.33 walls and ceilings per hour, with a back up for each pump that is used for breakdowns, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(r) One (1) airless paint application system, coating and texturing a maximum of 0.33 ceilings per hour, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(s) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 0.33 floors per hour, and exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(t) Two (2) high volume-low pressure (HVLP) adhesive application systems, coating a total maximum of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(u) Facilities using VOC containing adhesives, each coating a maximum of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(v) Eight (8) spray booths, identified as EU1, each with a maximum rating of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters, and booth 6 exhausting to two (2) stacks and all other booths each exhausting to one (1) stack, identified as S-1 through S-9. [Kustom Woodworking]

The following woodworking equipment:

(a) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-1. [Fairmont Homes - Building 1]

(b) Woodworking equipment, with particulate matter controlled by one(1) cyclone, and exhausting to one (1) stack, identified as D-2. [Fairmont Homes - Building 1A]

(c) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-53. [Fairmont Homes - Building 5]

(d) Woodworking equipment, with particulate matter uncontrolled, and exhausting inside Buildings 5A/7A. [Fairmont Homes - Building 5A/7A]

(e) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-3. [Fairmont Homes - Building 12]

(f) Woodworking equipment, controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-141. [Fairmont Homes - Building 14/16]

(g) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting to one (1) stack, identified as D-142. [Fairmont Homes - Building 22]

(h) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting inside the building. [Kustom Woodworking]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings.

(b) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Two (2) natural gas-fired boilers, identified as Boilers 5 and 7, each with a heat input capacity of 4.72 million Btu per hour, and exhausting in buildings 5 and 7, respectively.

(2) One (1) natural gas-fired boiler, identified as Boiler 12, with a heat input capacity of 2.31 million Btu per hour, and exhausting in building 12.

(3) One (1) natural gas-fired boiler, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in building 14.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) 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 Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Unless otherwise provided by this permit, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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, OAM, on or before the date it is due.

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

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

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

B.13 Emergency Provisions [326 IAC 2-7-16]

(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 2-7-16.

(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, OAM, 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 Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, 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 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, 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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

(B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, , upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 until IDEM, OAM, **,** 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 in writing by IDEM, OAM, **,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 2-1 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
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 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch , within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute overlapping 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement 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, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality, unless otherwise provided by the Compliance Response Plan.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

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

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(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, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following surface coating facilities:

(a) One (1) airless vapor barrier application system, coating a maximum capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(b) Two (2) flowcoating foam application systems coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(c) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(d) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 1C]

(e) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(f) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3 [Fairmont Homes - Building 5]

(g) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(h) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 5A]

(i) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(j) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(k) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(l) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 7A]

(m) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(n) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

The following surface coating facilities (contd.):

(o) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(p) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 12B]

(q) Two (2) airless paint application system, coating a maximum of 0.33 walls and ceilings per hour, with a back up for each pump that is used for breakdowns, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(r) One (1) airless paint application system, coating and texturing a maximum of 0.33 ceilings per hour, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(s) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 0.33 floors per hour, and exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(t) Two (2) high volume-low pressure (HVLP) adhesive application systems, coating a total maximum of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(u) Facilities using VOC containing adhesives, each coating a maximum of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(v) Eight (8) spray booths, identified as EU1, each with a maximum rating of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters, and booth 6 exhausting to two (2) stacks and all other booths each exhausting to one (1) stack, identified as S-1 through S-9. [Kustom Woodworking]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12] [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to CP-039-4626-00034, issued on May 30, 1996, the Fairmont Homes surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(b) The Kustom Woodworking surface coating facilities, identified as EU1, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

Pursuant to 326 IAC 6-3-2(c), the PM from the spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Particulate Matter (PM)

Pursuant to CP-039-4626-00034, issued on May 30, 1996, the dry filters for PM control shall be in operation at all times when the spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 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 spray booths stacks while the associated booths is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit and the VOC usage limits established in Condition D.1.2.

(1) The amount and VOC content of each coating material and solvent, including solvents used for cleanup and thinners. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(c) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) An Initial Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following woodworking equipment:

(w) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-1. [Fairmont Homes - Building 1]

(x) Woodworking equipment, with particulate matter controlled by one(1) cyclone, and exhausting to one (1) stack, identified as D-2. [Fairmont Homes - Building 1A]

(y) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-53. [Fairmont Homes - Building 5]

(z) Woodworking equipment, with particulate matter uncontrolled, and exhausting inside Buildings 5A/7A. [Fairmont Homes - Building 5A/7A]

(aa) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-3. [Fairmont Homes - Building 12]

(bb) Woodworking equipment, controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-141. [Fairmont Homes - Building 14/16]

(cc) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting to one (1) stack, identified as D-142. [Fairmont Homes - Building 22]

(dd) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting to inside the building KWW. [Kustom Woodworking]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Process Operations) and CP-039-4626-00034, issued on May 30, 1996, the particulate matter (PM) from the woodworking equipment shall be limited as follows:

Building	Dust Collector	Allowable Emission Rate (lbs/hr)
1	Cyclone D-1	0.77
1A	Cyclone D-2	19.62
5	Cyclone D-53	0.551
5A/7A	no control	1.96
12	Cyclone D-3	0.67
14	Cyclone D-141	0.57
22	Cyclone/Baghouse D-142	4.89
KWW	Cyclone/Baghouse	4.89

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

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

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

D.2.2 Opacity [326 IAC 2-1-3(i)(8)]

Pursuant to CP-039-4626-00034, issued on May 30, 1996, the visible PM emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

Pursuant to CP-039-4626-00034, issued on May 30, 1996, the baghouses and cyclones for PM control shall be in operation at all times when the associated woodworking equipment is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhausts shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Baghouse and Cyclone Inspections

An inspection shall be performed each calender quarter of all bags and cyclones controlling the woodworking operation when venting to the atmosphere. A baghouse and cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced. All defective cyclones shall be repaired or replaced.

D.2.8 Broken or Failed Bag or Cyclone Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following insignificant activities:

(a) Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings.

(b) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Two (2) natural gas-fired boilers, identified as Boilers 5 and 7, each with a heat input capacity of 4.72 million Btu per hour, and exhausting in buildings 5 and 7, respectively.

(2) One (1) natural gas-fired boiler, identified as Boiler 12, with a heat input capacity of 2.31 million Btu per hour, and exhausting in building 12.

(3) One (1) natural gas-fired boiler, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in building 14.

Boilers ***Natural Gas-fired Boilers less than 10 MMBtu/hr***

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Boilers 5, 7, and 12 shall each be limited to six-tenths (0.6) pound per million Btu heat input.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Boiler 14 shall be limited to five-tenths (0.5) pound per million Btu heat input.

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the insignificant woodworking shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550 Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509

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:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550 Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509

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

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
- C The Permittee must submit notice in writing within ten (**10**) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

PART 70 OPERATING PERMIT
Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and
Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR:_____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509
Facility: Fairmont Homes Surface Coating Facilities
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive month period

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)	VOC Limit (tons)
				Less than 250
				Less than 250
				Less than 250

9 No deviation occurred in this quarter.

9 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 MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509
Facility: Kustom Woodworking Surface Coating Facilities (EU1)
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive month period

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)	VOC Limit (tons)
				Less than 250
				Less than 250
				Less than 250

9 No deviation occurred in this quarter.

9 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 MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Fairmont Homes, Inc./Kustom Woodworking
Source Address: Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and
Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
Mailing Address: Fairmont Homes, P.O. Box 27, Nappanee, Indiana 46550
Kustom Woodworking, P.O. Box 366, Nappanee, Indiana 46550
Part 70 Permit No.: T039-6992-00509

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Fairmont Homes, Inc./Kustom Woodworking**
Source Location:	**Fairmont Homes, 502 S. Oakland, Nappanee, Indiana 46550**
	Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
County:	**Elkhart**
SIC Code:	**2451 and 2499**
Operation Permit No.:	**T039-6992-00509**
Permit Reviewer:	**Bryan Sheets**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Fairmont Homes, Inc./Kustom Woodworking relating to the operation of the framed home manufacturing process.

Source Definition

For the purposes of Title V, this source consists of two (2) companies:

(1) Fairmont Homes, Inc. is located at 502 S. Oakland, Nappanee, Indiana 46550;

(2) Kustom Woodworking (subsidiary of Fairmont Homes) is located at 401 E. Lincoln, Nappanee, Indiana 46550.

Since the two (2) companies meet the definition of adjacency based on the distance and relationship between these sources, have the same two-digit SIC code as described in the 1987 SIC manual, and are owned by one (1) company, they will be considered one (1) source.

One Part 70 permit will be issued for Fairmont Homes, Inc. and Kustom Woodworking. In addition, a new source identification number of 039-00509 will be assigned to this source. This new number will replace the old ID numbers of 039-00334 and 039-00219.

Permitted Emission Units and Pollution Control Equipment

The Fairmont Homes and Showcase Homes plants consist of the following permitted emission units and pollution control devices:

The following surface coating facilities:

(1) One (1) airless vapor barrier application system, coating a maximum capacity of 1.5 floors per hour, with overspray controlled by stationary walls, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(2) Two (2) flowcoating foam application systems coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(3) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V1. [Fairmont Homes - Building 1]

(4) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 1C]

(5) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(6) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3 [Fairmont Homes - Building 5]

(7) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to four (4) vents, all identified as V3. [Fairmont Homes - Building 5]

(8) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 5A]

(9) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(10) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(11) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to five (5) vents, all identified as V6. [Fairmont Homes - Building 7]

(12) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 7A]

(13) Two (2) flowcoating foam application systems, coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(14) One (1) airless vapor barrier application system, coating a maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(15) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 1.5 floors per hour, and exhausting to three (3) vents, all identified as V2. [Fairmont Homes - Building 12]

(16) One (1) flowcoating adhesive application system, coating a maximum of 1.5 floors per hour, and exhausting inside the building. [Fairmont Homes - Building 12B]

(17) Two (2) airless paint application system, coating a maximum of 0.33 walls and ceilings per hour, with a back up for each pump that is used for breakdowns, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(18) One (1) airless paint application system, coating and texturing a maximum of 0.33 ceilings per hour, and exhausting to exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(19) Facilities using sealants, adhesives, caulks, and other miscellaneous VOC containing materials coating a total maximum of 0.33 floors per hour, and exhausting to eight (8) vents, identified as V-5. [Fairmont Homes - Building 14/16]

(20) Two (2) high volume-low pressure (HVLP) adhesive application systems, coating a total maximum of 12.0 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(21) Facilities using VOC containing adhesives, each coating a maximum of 9.5 floors per hour, and exhausting to four (4) vents, all identified as V4. [Fairmont Homes - Building 22]

(22) Eight (8) spray booths, identified as EU1, each with a maximum rating of 6400 square feet of cabinet doors per hour, with particulate overspray controlled by dry filters, and booth 6 exhausting to two (2) stacks and all other booths each exhausting to one (1) stack, identified as S-1 through S-9. [Kustom Woodworking]

The following woodworking equipment:

(1) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-1. [Fairmont Homes - Building 1]

(2) Woodworking equipment, with particulate matter controlled by one(1) cyclone, and exhausting to one (1) stack, identified as D-2. [Fairmont Homes - Building 1A]

(3) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-53. [Fairmont Homes - Building 5]

(4) Woodworking equipment, with particulate matter uncontrolled, and exhausting inside Buildings 5A/7A. [Fairmont Homes - Building 5A/7A]

(5) Woodworking equipment, with particulate matter controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-3. [Fairmont Homes - Building 12]

(6) Woodworking equipment, controlled by one (1) cyclone, and exhausting to one (1) stack, identified as D-141. [Fairmont Homes - Building 14/16]

(7) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting to one (1) stack, identified as D-142. [Fairmont Homes - Building 22]

(8) Woodworking equipment, controlled by one (1) cyclone/baghouse system, and exhausting inside the building KWW. [Kustom Woodworking]

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Space heaters, process heaters, or boilers using the following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including but not limited to:

i) Two (2) natural gas-fired boilers, identified as Boilers 5 and 7, each with a heat input capacity of 4.72 million Btu per hour, and exhausting in buildings 5 and 7, respectively.

ii) One (1) natural gas-fired boiler, identified as Boiler 12, with a heat input capacity of 2.31 million Btu per hour, and exhausting in building 12.

iii) One (1) natural gas-fired boiler, identified as Boiler 14, with a heat input capacity of 4.72 million Btu per hour, and exhausting in building 14.

(2) 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.

(3) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

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

(5) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

(6) Paved and unpaved roads and parking lots with public access.

(7) Other categories with emissions below insignificant thresholds

(A) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:

(i) One (1) 10,000 gallon diesel fuel storage tank, identified as UST 1, and exhausting to the ambient air

(ii) One (1) 8,000 gallon diesel fuel storage tank, identified as UST 2, and exhausting to the ambient air

(B) Small woodworking equipment, with particulate matter controlled by portable baghouses or uncontrolled, and exhausting inside the buildings.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP 039-4626-00334, issued on May 30, 1996. [Fairmont Homes]

(2) A 039-6175-00334, issued on July 18, 1996. [Fairmont Homes]

(3) A 039-8279-00334, isssued on March 24, 1997. [Fairmont Homes]

(4) CP 039-8218-00334, issued on July 12, 1997. [Fairmont Homes]

(5) OP 20-12-91-0676, issued on August 12, 1988. [Coppes Cabinets purchased by Kustom Woodworking]

(6) E 039-3391-00219, issued on December 21, 1993. [Kustom Woodworking]

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on October 23, 1996. Additional information was received on September 22, 1998.

Emission Calculations

The calculations performed for the previous Fairmont Homes construction permits have been verified and found to be accurate and correct for the existing source. The calculations for Kustom Woodworking facilities are provided in Appendix A of this document.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 100
PM-10	greater than 100
SO_2	less than 100
VOC	greater than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Methyl Ethyl Ketone (MEK)	greater than 10
Methylene Chloride	greater than 10
Vinyl Acetate	less than 10
Ethylene Glycols	less than 10
4-4' Methylenediphenyl Diisoncyanate (MDI)	less than 10
Methanol	greater than 10
Hexane	less than 10
Xylenes	less than 10
Methyl Chloroform	greater than 10
Diethylene Ether	less than 10
1,2 Epoxybutane	less than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in 326 IAC 1-2-55) of PM_{10} and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)	
	Fairmont Homes	Kustom Woodworking
PM	N/A	N/A
PM-10	0.085	0.003
SO_2	0.017	0.001
VOC	53.2	46.2
CO	0.65	0.02
NO_x	N/A	N/A
HAP	7.36	16.1

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Woodworking	140.6	140.6					
Fairmont Homes Surface Coating	120	120		249			98
Kustom Woodworking Surface Coating	3.3	3.3		249			116
Unpaved Roads	15.2	15.2					
Combustion	1.6	1.6	0.1	0.8	4.1	13.1	--
Total Emissions	203	203	0	499	4	13	214

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment or Unclassifiable
SO_2	Attainment or Unclassifiable
Ozone	Attainment or Unclassifiable
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The storage tanks at this source are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110 Subparts K, Ka, and Kb), because the capacities of all the tanks are less than 10,500 gallons.

(b) The boilers at this source are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the heat input capacities of all the boilers are less than 10 million Btu per hour.

(c) The surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for wood furniture manufacturing (40 CFR 63.800, Subpart JJ) because Fairmont Homes, Inc. and Kustom Woodworking is a major source as defined in 40 CFR Part 63.2. The compliance date for this existing source is December 7, 1998 because actual HAP emissions for the source were less than 50 tons in 1996. A copy of the federal rule is enclosed.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 4-1 (Open Burning)

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.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability - Surface Coating

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 326 IAC 2-2 and 40 CFR 52.21, this source is a major source. However, due to the fact that Fairmont Homes and Kustom Woodworking have accepted significant threshold limits on their surface coating equipment they have never received a PSD permit. The facilities are limited as follows:

(a) The Fairmont Homes surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period.

(b) The Kustom Woodworking surface coating facilities shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period.

Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood cabinets, counter tops and doors shall utilize on or more of the following application methods:

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

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating applications equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations),the particulate matter (PM) from the spray coating application systems shall be limited by the following:

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

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

The dry filters shall be in operation at all times the mobile home metal frame spray booth and the Kustom Woodworking spray booths are in operation, in order to comply with this limit. All other spraying is conducted inside the finished houses.

State Rule Applicability - Woodworking Equipment

326 IAC 6-3-2 (Process Operations)

Pursuant to CP-039-4626-00034, issued on May 30, 1996, and 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the significant woodworking equipment shall be limited as follows:

Building	Dust Collector	Allowable Emission Rate (lbs/hr)
1	Cyclone D-1	0.77
1A	Cyclone D-2	19.62
5	Cyclone D-53	0.42^
5	Cyclone D-54*	0.80
7	Cyclone D-51*	0.54
7	Cyclone D-52*	0.63

5A/7A	no control	1.96
12	Cyclone D-3	0.67
14	Cyclone D-141	0.57
22	Cyclone/Baghouse D-142	5.68
KWW	Cyclone/Baghouse	2.29

* These dust collection systems have been removed since issuance of CP-039-4626-00034 and have been replaced with individual baghouses which exhaust inside the buildings. These limits will not be included in the permit.

^ 326 IAC 6-3-2 (Process Operation) was not intended to limit processes with throughputs below 100 pounds per hour to less than 0.551 pounds per hour. Therefore, this limit will be adjusted to 0.551 pounds per hour.

These limits were calculated using the following equation:

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

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

The cyclones and baghouse shall be in operation at all times the associated woodworking equipment is in operation, in order to comply with these limits.

State Rule Applicability - Boilers

326 IAC 6-2-3 (Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Emission Limitations for Sources of Indirect Heating), the PM emissions from Boilers 5, 7, and 12 (constructed in 1979, 1978, and 1976, respectively) shall each not exceed 1.1 pounds per million Btu based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where $C = 50\ u/m^3$
Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)
N = number of stacks
a = plume rise factor (0.67)
h = stack height (ft)

However, pursuant to 326 IAC 6-2-3(e), boilers with a heat input capacity less than 250 million Btu per hour which began operation after June 8, 1972, shall each not have PM emissions which exceed 0.6 pounds per million Btu. Therefore, Boilers 5, 7, and 12 will be limited to 0.6 pounds PM per million Btu heat input.

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

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating), the PM emissions from Boiler 14 (constructed in 1988) shall not exceed 0.5 pounds per million Btu based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

State Rule Applicability - Insignificant Woodworking Equipment

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations),the particulate matter (PM) from the insignificant woodworking, including controlled and uncontrolled equipment exhausting inside the buildings shall be limited by the following:

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

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

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The surface coating equipment has applicable compliance monitoring conditions as specified below:

   (a) Daily visible emissions notations of the spray booths stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 5-1 (Opacity) and 326 IAC 2-7 (Part 70).

2. The woodworking equipment has applicable compliance monitoring conditions as specified below:

   (a) Daily visible emissions notations of the woodworking stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

   (b) An inspection shall be performed each calender quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

   These monitoring conditions are necessary because the baghouses and cyclones for the woodworking equipment must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 5-1 (Opacity) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this framed home manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-6992-00509.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Fairmont Homes, Inc. and Kustom Woodworking
Source Location:	Fairmont Homes, 502 S Oakland Avenue, Nappanee, Indiana 46550; and Kustom Woodworking, 401 East Lincoln, Nappanee, Indiana 46550
County:	Elkhart
SIC Code:	2451 and 2499
Operation Permit No.:	T039-6992-00509
Permit Reviewer:	Bryan Sheets

On October 24, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Fairmont Homes, Inc. and Fairmont Homes had applied for a Part 70 Operating Permit to operate a stationary framed home manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 24, 1998, the law offices of Plews Shadley Racher & Braun submitted comments on behalf of Fairmont Homes, Inc. and Kustom Woodworking for their proposed Part 70 permit. The summary of the comments is as follows:

Summary of Comments 1, 2 and 17:

The woodworking equipment identified in Section A.2 and D.2 should be listed as insignificant activities. Since these activities are insignificant they should be deleted from Section D.2. Section D.3 adequately addresses the insignificant woodworking activities.

Response:

For the woodworking equipment in Section D.2 to be considered insignificant it would need to either have uncontrolled potential emissions less than five (5) pounds per hour and twenty-five (25) pounds per day, or meet the specification listed in 326 IAC 2-7-1(21)(G)(xxiii) as follows:

> 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 three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following:
>
> (AA) Deburring
> (BB) Buffing.
> (CC) Polishing.
> (DD) Abrasive blasting.
> (EE) Pneumatic conveying.
> (FF) Woodworking operations.

Since the woodworking equipment listed in Section D.2 does not fit into either of the categories above it was not considered an insignificant activity.

Summary of comment 3:

Fairmont Homes and Kustom Woodworking request that the first sentence of Condition B.10(a) be supplemented to clarify that certification is not required for all forms and reports.

Response:

IDEM, OAM agrees. Condition B.10(a) has been revised to clarify that not all reports require a certification by the responsible official.

(a) **Unless otherwise provided by this permit**, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Summary of comment 4:

Condition B.11 should clearly state that the time period for coverage of the initial annual compliance certification report should be from the date of final permit issuance through December 31 of the same year. In addition, the condition should more clearly specify which term is and conditions must be included in the compliance certification. Are the applicable terms and conditions only those found in Section D?

Response:

Both of these issues were brought up during the FESOP issuance period. Nonrule Policy Document (NPD) 007 was drafted to clarify this condition. This NPD will be revised to include guidance on the submittal of the Title V annual compliance certification. In general, the same guidance will apply. A copy of this NPD is included with this TSD addendum. The condition will remain unchanged.

Summary of comment 5:

Fairmont Homes and Kustom Woodworking request that Condition B.27, regarding credible evidence, be removed from the permit because it lacks statutory authority and is an unlawful revision of substantive standards.

Response:

The IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Condition B.27 will be removed from the permit

Summary of comment 6:

To the extent that the compliance monitoring requirements included in this draft Part 70 Operating Permit are based on an unpromulgated guidance document that is being applied as if it were law and to the extent the requirements are in addition to or differing in terms of applicability or detail from the recently promulgated EPA CAM rule, IDEM is overreaching its authority and has failed to go through the proper rulemaking process. Fairmont Homes and Kustom Woodworking request that the compliance monitoring requirements in Condition C.16 and Section D be no more extensive than is contained in the EPA CAM rule.

Response:

The U.S. EPA's OAM rule supplements the existing federal requirements of 40 CFR 70 and corresponding Indiana authority under 326 IAC 2-7. The CAM rule does not apply to this permit (nor does it apply to the majority of Indiana's initial Part 70 permits) because a completed application was received prior to this rule. The OAM is continuing to implement Indiana's established approach to compliance monitoring while considering how to address the federal CAM rule through the State rulemaking process. An overview of the established compliance monitoring approach follows.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring t would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to included a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee’s PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widgets was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13). 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand.

The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Summary of comment 7:

The last sentence of Condition C.17(a) states that "OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests" after an initial stack test indicating noncompliance. Because stack testing frequently can lead to inaccurate reporting of results, it is requested that this reservation be relocated to paragraph (b), which would allow for the retest to occur prior to enforcement activities.

Response:

IDEM does not believe that stack tests frequently lead to inaccurate results. In the rare instances where stack test results proved inaccurate, IDEM would use discretion in pursuing enforcement activities. However, IDEM's authority to pursue enforcement actions based on a violation of an applicable limit in the Title V permit is found in 326 IAC 2-7-5 and 326 IAC 2-7-6. The condition will remain unchanged.

Summary of comment 8:

Condition C.19(c) should be clarified to provide that:

> If the equipment is operating but abnormal conditions prevail, additional observations and sampling ~~should be taken~~ *may be necessary, as warranted by the Compliance Response Plan*, with a record made of the nature of the abnormality.

Response:

IDEM, OAM recognizes that there may be abnormal conditions for which the company has already determined the cause and has response steps identified in the CRP. In those situations, it would not be necessary to perform additional observations. Therefore, IDEM, OAM will revise the language in Condition C.19(c) as follows:

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality, **unless otherwise provided by the Compliance Response Plan**.

Summary of comment 9:

The PSD minor limit in Condition D.1.2(a) should solely be based upon limiting the actual emissions, not the material usage to less than 250 tons per 12 consecutive month period. Neither Fairmont Homes Construction Permit CP039-4625-00034, nor the applicable regulations require or necessitate the imposition of a VOC usage limitation rather than an emission limitation.

Response:

For purposes of determining compliance for most surface coating operations, the VOC usage will equal the VOC emissions. It is IDEM's experience that the type of Fairmont's surface coating operations will have 100% of VOC's emitted during the coating process. Therefore, to document compliance with the limitation, VOC usage records are the most practical and accurate method.

Summary of comment 10:

In Conditions D.1.8(b), D.2.4, D.3.2, and D.3.4, IDEM is overreaching its authority pursuant to 326 IAC 2-1-4(f) by expanding the regulatory language to require compliance testing "at any specific time." The phrase "at any specific time" should be deleted from the Section D Testing Requirements noted above.

Response:

IDEM disagrees that the language in 326 IAC 2-1-4(f) does not authorize testing "at any specific time." The rule states:

> "The commissioner may require compliance testing when necessary to prove that a source or facility is in compliance or will be in compliance with all applicable regulations. The compliance testing shall be done in accordance with methods and under operating conditions approved by the commissioner. Any source or facility subject to this subsection may appeal this requirement to the board in accordance with IC 4-21.5. The owner or operator of the source or facility shall furnish the commissioner a written report of the results of such compliance test, including the following:" (copy of rule enclosed)

Furthermore, OAM has included the phrase "testing at any specific time" because under 326 IAC 2-7-6(1), (6) OAM has the authority to include permit terms that include testing requirements sufficient to insure compliance with the Part 70 permit consistent with 326 IAC 2-7-5(3).

Summary of comment 11:

Fairmont Homes and Kustom Woodworking request that the compliance demonstration required in Condition D.1.10 be revised to allow demonstration 30 days after the end of the compliance period to allow time to collect the information and calculate emissions.

Response:

The intent of Condition D.1.10 is to indicate when the compliance periods end for the surface coating limitation in Condition D.1.2(a) and at what points records should indicate compliance. It was not intended that reports be available for submittal at that date. If an inspector were to enter the plant the day after a compliance period, which in this case is each 12 month period, records should be available which would allow him/her to document compliance, although it may not be in an organized report form. However, condition C.21(c) specifically states that any reports required must be submitted within 30 days after the end of the reporting period, which would allow appropriate time to compile and organize the information for a report.

Summary of comment 12:

The monitoring requirements in Conditions D.1.12, D.1.13(c), D.2.6 and D.2.9(a) associated with the insignificant particulate emissions from facilities such as surface coating facilities, closed-loop dust collectors, and small woodworking equipment equipped with cyclones and baghouses is unreasonable, over burdensome, and expensive.

The daily and weekly monitoring and associated record keeping of filter alignment and integrity, stack visible emissions and presence of overspray on rooftops is excessive and unwarranted. Since the filters will be inspected daily and the CMP will require proper placement and replacement, as needed, further daily observations are not needed. In addition, the record keeping pursuant to the daily filter inspections and weekly stack observations requirement should be narrowed to requiring only a log of abnormal of faulty conditions. We request that the requirement for daily observation and record keeping of overspray be removed in its entirety.

Section D.1.12(b) requires "response steps for when . . . evidence of overspray emission is observed." Even though emissions are expected to be small, the dry filters will not capture everything and some overspray will be emitted. To require these facilities to take response steps when "evidence of overspray emission is observed" is over burdensome and not consistent with the applicable limitations. We request that this wording be stricken from the condition.

Response:

The compliance monitoring required in Conditions D.1.12, D.1.13(c), D.2.6 and D.2.9(a) is necessary to assure that the woodworking and surface coating facilities are meeting the applicable PM limitations.

With the exception of spray booths that qualify as insignificant activities and a positive establishment that controls would never be necessary to comply, the OAM had previously included daily filter checks, daily visible observations, and weekly checks for abnormal over spray accumulation at the exhaust for all spray booths. IDEM, OAM recognizes that this can require a significant amount of resources at a plant with a large number of spray booths. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in our compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. The new model requires weekly, rather than daily, visible observations and monthly, rather than weekly, rooftop over spray checks.

With regard to the language in Condition D.1.12(b), it states that response steps are required when there is evidence of overspray emissions or when there is a noticeable change in overspray emissions. IDEM recognizes that some overspray on rooftops is normal. The language has been formatted in a manner to allow the company to determine when there is an abnormal situation which would indicate a problem with the dry filters. Conditions D.1.12 and D.1.13(b) will be revised as follows:

D.1.12 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, ~~daily~~ **weekly** observations shall be made of the overspray from the spray booth stacks while the associated booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.13 Record Keeping Requirements

(b) To document compliance with Condition D.1.12, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Summary of comment 13:

Because the surface coating facilities utilize some solvents in both the coating process and cleanup operations and material usage is determined from the purchasing, we are not able to differentiate between the usage of solvents as thinners or cleanup. Therefore, (a)(3) of Condition D.1.13 should be deleted in its entirety.

Paragraph (a)(2) should also be deleted because all information is based on purchasing records, not the date of use, and the precise day a material is used is irrelevant and over burdensome.

The record keeping period for the "total VOC usage" per (a)(4) should be revised to "each compliance period" to be consistent with the requirement of (a)(5) for recording the VOCs emitted and the Quarterly Report requirements.

Response:

IDEM, OAM agrees that the wording in Condition D.1.13(a) regarding the solvent record keeping is confusing. The wording will be changed to make it clear that records must not differentiate between cleanup and coating usage.

Since the VOC limit for Fairmont Homes and Kustom Woodworking does not require daily record keeping and since purchase records are being used to document compliance, the requirement to keep a log of the dates of use will be removed from the permit.

Total VOC usage records should be kept such that compliance can be determined at the end of each month. The VOC usage limit is based on monthly rolling VOC usage which must have records which demonstrate that at the end of any given month VOC emissions for the previous 12 month period have not exceed the limit. Paragraph (a)(4) will not be changed.

Condition D.1.13 will be revised as follows:

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(3)** below. Records maintained for (1) through ~~(5)~~ **(3)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit and the VOC usage limits established in Condition D.1.2.

(1) The amount and VOC content of each coating material and solvent, **including solvents used for cleanup and thinners**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

~~(2) A log of the dates of use;~~

~~(3) The cleanup solvent usage for each month;~~

~~(4)~~ **(2)** The total VOC usage for each month; and

~~(5)~~ **(3)** The weight of VOCs emitted for each compliance period.

Summary of comment 14:

Condition D.1.13(b)(1) requires that Certified Product Data Sheets (CPDS) be available and kept for each coating. Certified Product Data Sheets are not available from our suppliers. We request that this be reworded to require Material Safety Data Sheets (MSDS).

Response:

If the MSDS provided by Fairmont Homes and Kustom Woodworking's suppliers meet the definition of a CPDS as stated in 40 CFR 63.801, then they may be used. However, because the NESHAP specifically defines a CPDS, this term must be carried through in the Title V permit.

Summary of comment 15 and 16:

The requirement to document compliance with Condition D.1.5 by submitting a semi-annual Continuous Compliance Report in Condition D.1.14(c) is burdensome and expensive without any additional level of environmental protection. We request that this condition be deleted in its entirety.

Notwithstanding the above comment, the semi-annual reporting deadline should be revised to 60 days to allow an adequate time for preparation. This source initiates a reconciliation of its computers every month which can remove them from operation for 3-4 weeks after the end of the month and reporting within 30 days may not allow adequate time for preparation.

Response:

A semi-annual Continuous Compliance Report is required by the Federal NESHAP 40 CFR 63, Subpart JJ. The 30 day reporting requirement is stated in 40 CFR 63.808(c)(1) and can not be changed. Therefore, this requirement will not be removed.

Summary of comment 18:

The allowable emission rate set forth in Condition D.2.1 for the Cyclone/Baghouse at Kustom Woodworking and the Cyclone/Baghouse D-142 at Building 22 should be modified to reflect the maximum process weight rate of 1.3 tons per hour and 1.3 tons per hour, respectively.

Response:

IDEM, OAM recognizes that the process weight rates for these woodworking equipment has changed. Therefore, a new allowable limit will be calculated for the woodworking equipment controlled by the Cyclone/Baghouse system at Kustom Woodworking and the equipment controlled by the Cyclone/Baghouse D-142 system at Building 22. The new limits are determined by the following equation:

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

Condition D.2.1 will be revised as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Process Operations) and CP-039-4626-00034, issued on May 30, 1996, the particulate matter (PM) from the woodworking equipment shall be limited as follows:

Building	Dust Collector	Allowable Emission Rate (lbs/hr)
1	Cyclone D-1	0.77
1A	Cyclone D-2	19.62
5	Cyclone D-53	0.551
5A/7A	no control	1.96
12	Cyclone D-3	0.67
14	Cyclone D-141	0.57
22	Cyclone/Baghouse D-142	~~5.68~~ **4.89**
KWW	Cyclone/Baghouse	~~2.29~~ **4.89**

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

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

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

Summary of comment 19:

The following insignificant emission units have been removed from Fairmont Homes and Kustom Woodworking and should therefore be deleted from the insignificant activities list:

(2) 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.

(3) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(7) Other categories with emissions below insignificant thresholds

(A) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:

(i) One (1) 10,000 gallon diesel fuel storage tank, identified as UST 1, and exhausting to the ambient air

(ii) One (1) 8,000 gallon diesel fuel storage tank, identified as UST 2, and exhausting to the ambient air

Response:

None of insignificant activities listed above were specifically regulated and therefore, were not included in the permit. However, IDEM, OAM recognizes that these facilities are no longer a part of the Fairmont Homes and Kustom Woodworking source.

Summary of comments 20 and 21:

The existing approval identified in paragraph (6) on page 4 of the TSD is incorrectly listed. The correct exemption number is E 039-3381-00219.

The Recommendation Section in the TSD should be revised to include the additional information sent to IDEM dated October 21, 1998.

Response:

IDEM, OAM notes that these mistakes were made in the TSD. This addendum to the TSD shall serve as the record for these corrections.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition C.2 (Opacity) has been updated to include the revised rule language.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings~~ **in any one (1) six (6) minute averaging period**, as determined in 326 IAC 5-1-4.

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

2. Condition D.2.7 has been revised to clarify compliance monitoring requirements for cyclones as follows:

D.2.7 Baghouse **and Cyclone** Inspections

An inspection shall be performed each calender quarter of all bags **and cyclones** controlling the woodworking operation when venting to the atmosphere. A baghouse **and cyclone** inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced. **All defective cyclones shall be repaired or replaced.**

3. Condition D.2.8 has been revised to clarify the requirements for baghouse and cyclone monitoring and response steps as follows:

D.2.8 Broken **or Failed** Bag or ~~Failure~~ **Cyclone** Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For cyclones and single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Kustom Woodworking
Address City IN Zip: 401 East Lincoln, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6992-00509
Plant ID: 039-00509
Reviewer: Aaron Wiley/Bryan Sheets

Material	Density (lb/gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/sq ft)	Maximum (sq ft/hour)	Maximum (gal/hour)
Plastlac Plus	9.40	49.26%	0.0%	49.3%	0.0%	34.00%	0.00315	3840	12.10
Catalyst	8.70	70.46%	0.0%	70.5%	0.0%	9.00%	0.0025	3840	9.60
Reducer Care	8.40	100.00%	0.0%	100.0%	0.0%	0.00%	0.0025	3840	9.60
Surfacer	13.10	24.12%	0.0%	24.1%	0.0%	56.00%	0.0025	3840	9.60
Retarder	7.49	100.00%	0.0%	100.0%	0.0%	0.00%	0.0025	3840	9.60
Thinner/Cleanup	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	0.0025	6400	16.00
Cure-Pak Hardener	8.78	19.14%	0.0%	19.1%	0.0%	75.00%	0.0025	3840	9.60
Yoder Oak	7.37	96.88%	0.0%	96.9%	0.0%	2.00%	0.0025	2560	6.40

Add worst case coating to all solvents **Total** 82.50

Material	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Controlled Particulate Potential tons/yr	lb VOC /gal solids	PM Control Efficiency	Transfer Efficiency
Plastlac Plus	4.63	4.63	56.00	1344.10	245.30	126.36	6.32	13.62	95%	50%
Catalyst	6.13	6.13	58.85	1412.36	257.76	54.03	2.70	68.11	95%	50%
Reducer Care	8.40	8.40	80.64	1935.36	353.20	0.00	0.00	ERR	95%	100%
Surfacer	3.16	3.16	30.33	728.00	132.86	208.98	10.45	5.64	95%	50%
Retarder	7.49	7.49	71.90	1725.70	314.94	0.00	0.00	ERR	95%	100%
Thinner/Cleanup	7.01	7.01	112.16	2691.84	491.26	0.00	0.00	ERR	95%	100%
Cure-Pak Hardener	1.68	1.68	16.13	387.19	70.66	149.26	7.46	2.24	95%	50%
Yoder Oak	7.14	7.14	45.70	1096.71	200.15	3.22	0.16	357.00	95%	50%

			VOC	PM10	PM10
Weighted Average	5.72	**Total Emissions**	**2066.13**	**541.86**	**27.09**

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/hr) * (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 Emissions = Sum of all numbers
Total = Sum of all Gallons of material (gal/unit)
Weighted Average - pounds VOC per gallon = sum of [gallons of material (gal / hr) * Pounds of VOC per gallon of coating less water]/total (gal/hr)

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: Kustom Woodworking
Plant Location: 401 East Lincoln, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6992-00509
Plant ID: 039-00509
Permit Reviewer: Aaron Wiley/Bryan Sheets

Material	Density (lb/gal)	Gal of Mat (gal/sq ft)	Maximum (sq ft/hr)	Weight % Dibutyl Phthalate	Weight % Formaldehyde	Weight % Xylene	Weight % Glycol Ethers	Dibutyl Phthalate Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Xylene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Plastlac Plus	9.40	3.15E-03	3840	4.90%	0.09%	0.00%	0.00%	24.403	0.448	0.000	0.000
Catalyst	8.70	2.50E-03	3840	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
Reducer Care	8.40	2.50E-03	3840	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
Surfacer	13.10	2.50E-03	3840	4.90%	0.09%	15.00%	0.00%	26.991	0.496	82.624	0.000
Retarder	7.49	2.50E-03	3840	0.00%	0.00%	0.00%	50.00%	0.000	0.000	0.000	157.470
Thinner/Cleanup	7.01	2.50E-03	6400	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
Cure-Pak Hardener	8.78	2.50E-03	3840	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
Yoder Oak	7.37	2.50E-03	2560	0.00%	0.00%	92.56%	0.00%	0.000	0.000	191.225	0.000
Total Single HAP Emission								**51.393**	**0.944**	**273.849**	**157.470**

Material	Weight % Toluene	Weight % Methyl Alcohol	Weight % Methyl Isobutyl Ketone	Weight % Methyl Ethyl Ketone	Weight % Dimethyl Phthalate	Toluene Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)	Methyl Isobutyl Keytone Emissions (tons/yr)	Methyl Ethyl Keytone Emissions (tons/yr)	Dimethyl Phthalate Emissions (tons/yr)	
Plastlac Plus	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Catalyst	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Reducer Care	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Surfacer	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Retarder	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Thinner/Cleanup	60.00%	10.00%	10.00%	10.00%	0.00%	294.756	49.126	49.126	49.126	0.000	
Cure-Pak Hardener	0.00%	0.00%	0.00%	5.00%	5.00%	0.000	0.000	0.000	18.459	18.459	
Yoder Oak	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	
Total Single HAP Emission						**294.756**	**49.126**	**49.126**	**67.585**	**18.459**	

Total Combination HAPs **Total Combination HAPs** **962.71**

METHODOLOGY

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

Appendix A: Emissions Calculations
Woodworking Emissions

Company Name: Kustom Woodworking
Address City IN Zip: 401 East Lincoln, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6992-00509
Plant ID: 039-00509
Reviewer: Aaron Wiley/Bryan Sheets

Potential Emissions from the Woodworking Process

Throughput of Wood: 836 Lbs/hr * *
PM control equipment: Dust Collector - Baghouse
Grain Loading: 0.0028 grains/acf
Air Flow rate: 34798 acfm
Control Efficiency: 99.90%

Dust Collector Information
cloth area = 3698 sq ft
Air/cloth ratio = 9.41 cu ft/min-sq ft

After Control Emissions:
Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr) = 0.835 lb/hr
(lb/hr)(ton/2000 lb)(8760 hrs/yr) = 3.66 tons/yr

Before Control Emissions:
Emissions: (tons/yr) / (1-control efficiency) = 3658.0 tons/yr

Allowable Emissions From Woodworking

Wood throughput: (lbs wood/hr)(ton/2000 lb) = 0.418 tons/hr

326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$E = 4.10P^{0.67}$ Where E= emissions in lbs/hr
P= process weight rate in tons/hr

E = (4.10)(wood throughput)^0.67
= 2.29 lbs/hr
= 10.01 tons/yr

Since 3.66 tons per year is less than the allowable emission rate of 10.0 tons per year, the woodworking operations are in compliance with 326 IAC 6-3-2.

* * Throughput of Wood is less than actual and is calculated from the Before Control Emissions.

PM is assumed to equal PM-10.

Appendix A: Emissions Calculations
HAPs
Wood Furnature NESHAP

Company Name: Kustom Woodworking
Address City IN Zip: 401 East Lincoln, Nappanee, Indiana 46550
CP: Elkhart
Permit #: T039-6992-00509
Plant ID: 039-00509
Reviewer: Aaron Wiley/Bryan Sheets

Material	Density (lb/gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Usage (lbs/hr) Per Flow Diagram	Actual (gal/hour)
Plastlac Plus	9.40	49.26%	0.0%	49.3%	0.0%	34.00%	78.84	8.39
Catalyst	8.70	70.46%	0.0%	70.5%	0.0%	9.00%	4.77	0.55
Reducer Care	8.40	100.00%	0.0%	100.0%	0.0%	0.00%	3.69	0.44
Surfacer	13.10	24.12%	0.0%	24.1%	0.0%	56.00%	0.18	0.01
Retarder	7.49	100.00%	0.0%	100.0%	0.0%	0.00%	6.48	0.87
Thinner/Cleanup	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	5.04	0.72
Cure-Pak Hardener	8.78	19.14%	0.0%	19.1%	0.0%	75.00%	0.018	0.00
Yoder Oak	7.37	96.88%	0.0%	96.9%	0.0%	2.00%	33.03	4.48

Add worst case coating to all solvents **Total** 15.46

Material	Weight % HAPs	Pounds HAPs per gallon Coating	lb HAPs/hr	Pounds Solids per gallon Coating	lbs Solids per hr	lbs HAPs Per lbs Solids	
Plastlac Plus	4.99%	0.47	3.93	4.77	40.01	0.10	
Catalyst	0.00%	0.00	0.00	2.57	1.41	0.00	
Reducer Care	0.00%	0.00	0.00	0.00	0.00	n/a	
Surfacer	19.99%	2.62	0.04	9.94	0.14	0.26	
Retarder	50.00%	3.75	3.24	0.00	0.00	n/a	
Thinner/Cleanup	90.00%	6.31	4.54	0.00	0.00	n/a	
Cure-Pak Hardener	10.00%	0.88	0.00	7.10	0.01	0.12	
Yoder Oak	92.56%	6.82	30.57	0.23	1.03	29.67	
Weighted Averages		2.74		2.76		0.99	

Weighted Average lb HAPs/lb Solids 0.99

METHODOLOGY

Total = Sum of all Gallons of material (gal/hr)
Weighted Average (lbs VOC / gallon) = sum of [gal of material (gal / hr) * lb of VOC /gallon of coating less water]/total (gal/hr)
Weighted Average (lbs HAPs / gallon) = sum of [gal of material (gal / hr) * lbs of HAPs/ gallon of coating less water]/total (gal/hr
Weighted Average (lbs Solids / gallon) = sum of [gal of material (gal / hr) * lbs of solids/ gallon of coating less water]/total (gal/hr
lb HAPs/lb Solids = weighted average HAPs / weighted average lbs Solids per gallon