

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**SunnyBrook RV, Inc.  
11756 CR 14  
Middlebury, Indiana 46540**

(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.: T039-7803-00444	
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)]

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The Permittee owns and operates a stationary towable recreational vehicle manufacturing source.

Responsible Official: Elvie Frey  
Source Address: 11756 CR 14, Middlebury, Indiana 46540  
Mailing Address: 11756 CR 14, Middlebury, Indiana 46540  
SIC Code: 3792  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor 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)]

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

- (a) One (1) fiberglass insulation panel gluing operation, consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide.

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

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

- (a) One (1) pre-finished wood cabinet assembly and stain touch up operation, including five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method.

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

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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]

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- (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]

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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)]

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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)]

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- (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)]

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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)]

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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)]

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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)]

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- (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) 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); and
  - (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]

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- (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]**

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- (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)]**

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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)]**

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- (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]

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- (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]

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- (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 the 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)]**

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- (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)]**

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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]**

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- (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]**

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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)]**

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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.

**B.27 Enhanced New Source Review [326 IAC 2]**

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

**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 (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 in 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.

**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). Rule 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 unit vented to the control equipment is in operation.

C.8 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.9 Performance Testing [326 IAC 3-6]**

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- (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.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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

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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.12 Monitoring Methods [326 IAC 3]**

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

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

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- (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.15 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]

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- (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.16 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.
- (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.17 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual 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 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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)]:**

- (a) One (1) fiberglass insulation panel gluing operation, consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method.
- (b) The hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation.

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

#### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

- (a) Utilize air atomized spray equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44);
- (b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;
- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (d) Limit total VOC input to each facility as follows:
  - (1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period.
  - (2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to less than 29.4 tons per twelve (12) consecutive month period.
- (e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

**D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.3 Testing Requirements [326 IAC 2-7-6(1)]**

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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 VOC limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.4 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.1.5 VOC Emissions**

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Compliance with Condition D.1.1(d) shall be demonstrated at the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.

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

There are no applicable compliance monitoring conditions for this facility.

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

**D.1.6 Record Keeping Requirements**

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(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The volume weighted VOC content of the coatings used for each month;
- (3) The cleanup solvent usage for each month; and
- (4) The total VOC usage for each month.

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

**D.1.7 Reporting Requirements**

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There are no specific reporting requirements for these facilities.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, including five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method.
- (4) Hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.

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

#### D.2.1 Wood Furniture NESHAP [40CFR Part 63, Subpart JJ] [326 IAC 20-14]

- (a) The pre-finished wood cabinet assembly and stain touch up 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 §63.801(a), *Definitions*, the source shall qualify as an incidental furniture manufacturer. Pursuant to 40 CFR §63.800(a), *Applicability*, the source shall not use more than 100 gallons per month of finishing materials or 100 gallons per month of adhesives in the pre-finished wood cabinet assembly and stain touch up operation.

Compliance with this condition shall make all other provisions and requirements of Subpart JJ not applicable to the source.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase actual VOC usage for the hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping to greater than fifteen (15) pounds per day, before add-on controls, shall require OAM's prior approval before such change can take place.

#### D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Any change or modification which may increase actual VOC usage for the pre-finished wood cabinet assembly and stain touch up operation to greater than fifteen (15) pounds per day before add-on controls, excluding the use of up to 10 gallons of coating per day for touch-up and repair, shall require OAM's prior approval before such change can take place.

### **Compliance Determination Requirements**

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

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 applicable hazardous air pollutant limit(s) specified in 40 CFR Part 63 Subpart JJ and Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing and Subpart JJ.

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

There are no applicable compliance monitoring conditions for this facility.

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

### **D.2.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records on the total amount of finishing materials and adhesive materials used in the pre-finished wood cabinet assembly and stain touch up operation. The data shall be recorded monthly. Purchase orders or facility usage records shall be maintained in order to verify the type of material and monthly usage.
  
- (b) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.2.2 and D.2.3 for each operation.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day; and
  - (4) The total VOC usage for each day.
  
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.6 Reporting Requirements**

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There are no specific reporting requirements for this facility.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: SunnyBrook RV, Inc.  
Source Address: 11756 CR 14, Middlebury, Indiana 46540  
Mailing Address: 11756 CR 14, Middlebury, Indiana 46540  
Part 70 Permit No.: T039-7803-00444

**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: SunnyBrook RV, Inc.  
Source Address: 11756 CR 14, Middlebury, Indiana 46540  
Mailing Address: 11756 CR 14, Middlebury, Indiana 46540  
Part 70 Permit No.: T039-7803-00444

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9 1.</b>	This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="checkbox"/>	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
<input type="checkbox"/>	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
<b>9 2.</b>	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input type="checkbox"/>	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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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 COMPLIANCE MONITORING REPORT**

Source Name: SunnyBrook RV, Inc.  
Source Address: 11756 CR 14, Middlebury, Indiana 46540  
Mailing Address: 11756 CR 14, Middlebury, Indiana 46540  
Part 70 Permit No.: T039-7803-00444

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 semi-annually. 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	Number of Deviations	Date of each Deviations

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 and Enhanced New Source Review (ENSR)

#### Source Background And Description

**Source Name:** SunnyBrook RV, Inc.  
**Source Location:** 11756 CR 14, Middlebury, Indiana 46540  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** T039-7803-00444  
**Permit Reviewer:** Michael Hirtler/EVP

On November 26, 1997, the Office of Air Management (OAM) had a notice published in the Truth Publishing, Elkhart, Indiana, stating that SunnyBrook RV, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR) for the operation of a towable recreational vehicle manufacturing source. The notice also stated that OAM proposed to issue a permit for this installation 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 December 16, 1997, during the 30 day comment period, D&B Environmental Services, Inc. submitted on behalf of SunnyBrook RV, Inc., a request to remove the source limits proposed in the draft FESOP and to re-issue it as a Part 70 Operating permit. Therefore, the draft FESOP previously noticed for SunnyBrook RV, Inc. has been withdrawn and, in its place, the Office of Air Management (OAM) has reviewed a Part 70 permit and ENSR application from SunnyBrook RV, Inc. relating to the operation of their towable recreational vehicle manufacturing source.

#### Permitted Emission Units and Pollution Control Equipment

The source currently has no permitted emission units or pollution control devices.

#### Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) One (1) fiberglass insulation panel gluing operation, consisting of four (4) glue stations identified as FUG26, FUG39, FUG40 and FUG44, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an air atomized spray application method.
- (b) Hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), during product carpeting, paneling, and plastic pipe, linoleum and roof installation.
- (c) Hand application of mineral spirits for cleaning purposes plant-wide.

The unpermitted facilities/units also includes the insignificant activities listed below.

## Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted facilities and activities at the source are reviewed under the ENSR process. There are no new emissions units at this source during this review.

### Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (MM) British thermal units (Btu) per hour, including: one (1) 0.08 MMBtu/hr space heater, five (5) 0.16 MMBtu/hr space heaters, one (1) 0.10 MMBtu/hr space heater, and seven (7) 0.40 MMBtu/hr space heaters.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (f) Other categories with emissions below insignificant thresholds:
  - (1) Welding operations with PM-10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (Two (2) stick type welders, identified as FUG41 and FUG42).
  - (2) Woodworking equipment with PM-10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day each unit. (One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector; one (1) cutoff saw and nine (9) hand router systems, each with particulate matter controlled by a portable vacuum dust collector; three (3) cut off saws; three (3) band saws; eight (8) chop saws; one (1) table saw; two (2) edge sanders; one (1) bench grinder; two (2) hand buffers; one (1) drill press; one (1) mitre saw; twenty-five (25) portable hand held routers; five (5) hand held air sanders; and five (5) hand drills.)
  - (3) One (1) pre-finished wood cabinet assembly and stain touch up operation, including five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, cumulatively rated at 0.02 gallons of stain per hour, with each station utilizing an air atomized spray application method.
  - (4) Hand and aerosol spray application of miscellaneous coatings to metal trailer frames and piping.
  - (5) Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).

### Existing Approvals

This source has no existing air approvals.

### Enforcement Issue

- (a) IDEM is aware that the unpermitted emission units and pollution control equipment listed above has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

### 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 December 16, 1996. Additional information was received on September 29, 1997 and October 10, 1997, at which time it was determined that the application would be reviewed as a FESOP application. However, on December 16, 1997, which was during the 30 day draft FESOP public comment period, the applicant requested that the FESOP be reviewed as a Part 70 Operating permit application. Therefore, the application is reviewed as a Part 70 permit application.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (six (6) pages).

### 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	4.32
PM-10	4.32
SO <sub>2</sub>	0.01
VOC	80.50
CO	0.47
NO <sub>x</sub>	1.72

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

See attached spreadsheets for detailed calculations (six (6) pages in Appendix A).

HAP	Potential Emissions (tons/year)
xylene	6.32
toluene	1.29
ethyl benzene	3.08
hexane	12.66
cumene	0.07
glycol ethers	0.23
methanol	0.04
methyl ethyl ketone	3.83
TOTAL	27.53

See attached spreadsheets for detailed calculations (six (6) pages in Appendix A).

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination of 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.
- (b) The allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (c) This proposed Part 70 permit will also satisfy the requirements of the construction permit rules.

**Actual Emissions**

The following table shows the actual emissions from the source. For VOC, this information reflects the 1996 emissions data provided by the applicant, with remaining pollutants estimated as a ratio of the actual to potential VOC emissions data.

Pollutant	Actual Emissions (tons/year)
PM	1.01
PM-10	1.01
SO <sub>2</sub>	0.00
VOC	18.85
CO	0.11
xylene	1.48
toluene	0.30
ethyl benzene	0.72
hexane	2.97
cumene	0.02
glycol ethers	0.05
methanol	0.01
methyl ethyl ketone	0.90
total HAPs	6.45
NO <sub>x</sub>	0.40

**Limited Potential To Emit**

The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Glue Operation	3.0	3.0	0.0	28.4	0.0	0.0	9.3	9.6
Stain Touch Up*	0.1	0.1	0.0	0.1	0.0	0.0	0.1	0.1
Sealant/Adhesive Usage	0.0	0.0	0.0	29.4	0.0	0.0	6.2	16.3
Metal Coating*	0.0	0.0	0.0	0.9	0.0	0.0	0.2	0.2
Solvent Usage	0.0	0.0	0.0	16.9	0.0	0.0	0.0	0.0
Misc. Materials Containing* VOC	0.0	0.0	0.0	4.7	0.0	0.0	0.9	1.3
Natural Gas Combustion*	0.2	0.2	0.0	0.1	0.5	1.7	0.0	0.0
Welding*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Woodworking*	1.1	1.1	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Emissions</b>	<b>4.3</b>	<b>4.3</b>	<b>0.0</b>	<b>80.5</b>	<b>0.5</b>	<b>1.7</b>	<b>12.7**</b>	<b>27.5</b>

\* Insignificant activity

\*\* As hexane

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment (maintenance) for ozone.
- (b) PSD Requirements  
 The emissions from this stationary source were reviewed under the requirements of the Prevention of Significant Deterioration (PSD), 326 IAC 2-2, 40 CFR 52.21.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Federal Rule Applicability

- (a) The 500 gallon No. 2 diesel fuel oil storage tank is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels. The 500 gallon No. 2 diesel fuel oil storage tank was constructed after the rule applicability date of July 23, 1984, however, the tank capacity is less than the 40 cubic meter (10,560 gallon) threshold capacity for rule applicability.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for source categories, 326 IAC 20-14, (40 CFR 63, Subpart JJ), National Emission Standards for Wood Furniture Manufacturing Operations, due to its wood cabinet assembly process and because the plant is a major source of hazardous air pollutants (HAPs). A major source of HAPs is one that has the potential to emit any single HAP in amounts at, or greater than 10 tons per year or all HAPs combined in amounts at, or greater than 25 tons per year. Although this source is subject to Subpart JJ, it is considered as an *incidental furniture manufacturer* (i.e., a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components), since the cabinet components are pre-finished by the supplier. As such, and pursuant to 40 CFR 63.800 (Applicability), the source is not subject to any of the rule requirements other than the maintenance of purchase or usage records demonstrating that finishing material (i.e., touch-up stain) and adhesive usages are each less than 100 gallons per month for the cabinet assembly process. Compliance with this requirement for existing affected sources that emitted less than 50 tons per year of HAPs in 1996 is December 7, 1998. This source meets this emissions criteria, and it will comply with this requirement by December 7, 1998.

### State Rule Applicability - Entire Source

#### 326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The source was constructed in 1992, with additional equipment installed in 1993. Both dates are prior to the July 27, 1997 rule applicability date. However, as discussed above, the source is subject to 40 CFR 63, Subpart JJ for its wood cabinet assembly process. Because the source will meet the MACT requirements of Subpart JJ, the source is not subject to the requirements of 326 IAC 2-1-3.4.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of volatile organic compounds and it is located 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 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.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-3 (Particulate Rule - Process Operations)

The woodworking operations as an insignificant activity are subject to 326 IAC 6-3-2 (Particulate Emissions Limitations). Pursuant to this rule, particulate matter emissions from woodworking operations shall not exceed the limits established by the following:

For a process weight rate up to sixty thousand (60,000) pounds per hour, use of the equation:

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

or

For a process weight rate in excess of sixty thousand (60,000) pounds per hour, use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Particulate matter emissions from woodworking operations at the source are in compliance with 326 IAC 6-3-2, even when control devices are not in operation (see Appendix A, Page 4 of 6).

326 IAC 8-1-6 (New Facilities; General VOC Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8. The source was constructed in 1992, with additional equipment added in 1993. The fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44) and the plant-wide miscellaneous usage of sealants and adhesives, exclusive of the gluing operation, are two separate facilities. Since each facility has a PTE VOC in excess of 25 tons per year, both operations (i.e., facilities) are subject to the requirements of 326 IAC 8-1-6.

SunnyBrook RV, Inc. has submitted a BACT analysis, dated December 16, 1997, as part of this permit application. The options considered in the BACT analysis for the fiberglass insulation panel gluing operation and the plant-wide usage of sealants and adhesives, exclusive of the gluing operation, are:

- (a) Zeolite Rotary Concentrator with Recuperative Oxidizer Unit
- (b) Catalytic Recuperative Oxidizer Unit
- (c) (Thermal) Recuperative Oxidizer Unit
- (d) No add-on controls; current application methods and work practice standards.

The above control options were determined as technically feasible. A cost analysis for the add-on VOC control options was performed to determine the economic feasibility of these options for each facility. The cost analysis is based on potential VOC emissions of 28.4 tons per year and 29.4 tons per year for the fiberglass insulation panel gluing operation and the hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the gluing operation, respectively:

Tables (a) through (d) below show the results of the cost analysis.

(a)

Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total (1)
Zeolite Rotary Concentrator with Recuperative Oxidizer Unit	---	---	---	\$1,300,000.00
Catalytic Recuperative Oxidizer Unit	---	---	---	\$1,625,000.00
(Thermal) Recuperative Oxidizer Unit	---	---	---	\$1,350,000.00

(1) Total Capital Cost includes Base Price, Direct Cost and Indirect Cost.

(b)

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Zeolite Rotary Concentrator with Recuperative Oxidizer Unit	\$335,218.33	\$103,721.92	\$211,900.00	\$650,840.25
Catalytic Recuperative Oxidizer Unit	\$1,088,274.14	\$105,493.76	\$264,875.00	\$1,458,642.90
(Thermal) Recuperative Oxidizer Unit	\$1,954,863.07	\$94,493.76	\$220,050.00	\$2,269,406.83

(c)

Evaluation for Fiberglass Insulation Panel Gluing Operation (FUG26, FUG39, FUG40, FUG44)

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
Zeolite Rotary Concentrator with Recuperative Oxidizer Unit	28.4	27.0	95	\$24,105.19
Catalytic Recuperative Oxidizer Unit	28.4	27.0	95	\$54,023.81
(Thermal) Recuperative Oxidizer Unit	28.4	27.0	95	\$84,052.10

Methodology:

Emissions removed = (limited potential emissions from warehouse) \* (control efficiency)

\$/ton removed = total annual cost / emissions removed

(d)

Evaluation for the Hand Application of Miscellaneous Sealants and Adhesives Plant-Wide , Exclusive of the Fiberglass Insulation Panel Glue Operation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
Zeolite Rotary Concentrator with Recuperative Oxidizer Unit	29.4	27.9	95	\$23,327.61
Catalytic Recuperative Oxidizer Unit	29.4	27.9	95	\$52,281.11
(Thermal) Recuperative Oxidizer Unit	29.4	27.9	95	\$81,340.75

Methodology:

Emissions removed = (limited potential emissions from warehouse) \* (control efficiency)

\$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

(a) Capital Cost

- (1) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
- (2) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
- (3) Indirect installation cost: engineering, supervision, construction/field expenses, construction fee, start up, performance test, model study and contingencies.

(b) Annual Cost

- (1) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
- (2) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

The add-on control options evaluated above have been determined to be economically infeasible. For each facility, BACT has been determined to be no add-on VOC emissions control with the following work practices:

- (a) Utilize air atomized spray equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44);

- (b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;
- (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
- (d) Limit total VOC input to each facility as follows:
  - (1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to 2.4 tons per month. This input limitation is equivalent to VOC emissions of 28.4 tons per 12 month period.
  - (2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to 2.5 tons per month. This input limitation is equivalent to VOC emissions of 29.4 tons per 12 month period.
- (e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls, shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings. The metal coating operation at the source, as an insignificant activity, has actual VOC emissions of less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 do not apply to the source. The source shall maintain records demonstrating its non-applicability to this rule.

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

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 ( Wood Furniture and Cabinet Coating), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls, shall apply all coating materials, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one or more of the stated application systems. The stain touch up operation of pre-finished wood cabinets utilizes less than 10 gallons of stain for touch-up operations and actual VOC emissions from the facility (i.e., operation) are less than 15 pounds per day (see insignificant activities list). Therefore, the requirements of 326 IAC 8-2-12 do not apply to the source. The source shall maintain records demonstrating its non-applicability to this rule.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. The 500 gallon No. 2 diesel fuel oil storage tank is not subject to the requirements of 326 IAC 8-4-3 since the 500 gallon storage tank is below the 39,000 gallon threshold for rule applicability.

## Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D 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 in permit Section D. 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 fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, and FUG44) and the hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44) have applicable compliance monitoring conditions as specified below:
  - (a) Utilize air atomized spray equipment for adhesives application at the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44);
  - (b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at FUG26, FUG39, FUG40, and FUG44 to limit overspray;
  - (c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from FUG26, FUG39, FUG40 and FUG44 applicators during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;
  - (d) Limit total VOC input to each facility as follows:
    - (1) The total VOC input to the gluing operation, including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to 2.4 tons per month. This input limitation is equivalent to VOC emissions of 28.4 tons per 12 month period.
    - (2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives, exclusive of the fiberglass insulation panel gluing operation, shall be limited to 2.5 tons per month. This input limitation is equivalent to VOC emissions of 29.4 tons per 12 month period.

- (e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

These monitoring conditions are necessary because VOC emissions from the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, and FUG44) and the hand application of miscellaneous sealants and adhesives plant-wide, exclusive of the fiberglass insulation panel gluing operation (FUG26, FUG39, FUG40, FUG44), must each comply with the best available control technology (BACT) requirement of 326 IAC 8-1-6.

- 2. The pre-finished wood cabinet assembly and stain touch up operation, including five (5) stain touch up stations identified as FUG45, FUG46, FUG47, FUG48 and FUG49, has applicable compliance monitoring conditions as specified below:

- (a) The source shall not use more than 100 gallons per month of finishing materials or 100 gallons per month of adhesives in the pre-finished wood cabinet assembly and stain touch up operation.
- (b) The Permittee shall maintain records on the total amount of finishing materials and adhesive materials used in the pre-finished wood cabinet assembly and stain touch up operation. The data shall be recorded monthly. Purchase orders or facility usage records shall be maintained in order to verify the type of material and monthly usage.

These monitoring conditions are necessary because the pre-finished wood cabinet assembly and stain touch up operation must comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants 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) FESOP 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 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (see page 6 of 6, Appendix A).

The concentrations of these air toxics were modeled and found to be (in the worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate (ton/yr)	Modeled Conc. (Fg/m <sup>3</sup> )	OSHA PEL (Fg/m <sup>3</sup> )	% OSHA PEL
Xylene	1.44	6.32	2043.0	435,000	0.50%
Toluene	0.29	1.29	411.4	752,000	0.05%
Ethyl benzene	0.70	3.08	993.1	435,000	0.23%
Hexane	2.89	12.66	4100.2	1,800,000	0.23%
Cumene	0.02	0.07	28.4	245,000	0.01%
Glycol Ethers*	0.05	0.23	70.9	125,000*	0.06%
Methanol	0.01	0.04	14.2	260,000	0.01%
MEK	0.87	3.83	1234.3	590,000	0.21%

\* PEL for ethylene glycol used as default for this glycol ether.

**Conclusion**

The operation of this towable recreational vehicle manufacturing source will be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7803-00444**.

**Appendix A: Emissions Summary (Page 1 of 6)**

**Company Name: SunnyBrook RV, Inc.**  
**Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540**  
**Part 70 No.: T039-7803**  
**Plant ID: 039-00444**  
**Reviewer: Michael Hirtler**  
**Date: December 16, 1997**

**Potential Uncontrolled Emissions (tons/year)**

**Emissions Generating Activity**

Pollutant	Combustion	Surface Coating & Misc. VOC Usage	Welding	Woodworking		Total
PM	0.20	3.06	0.01	1.05		4.32
PM-10	0.20	3.06	0.01	1.05		4.32
SO2	0.01	0.00	0.00	0.00		0.01
NOx	1.72	0.00	0.00	0.00		1.72
VOC	0.13	80.37	0.00	0.00		80.50
CO	0.47	0.00	0.00	0.00		0.47
Single HAP	0.00	12.66	0.00	0.00		12.66
Total HAPs	0.00	27.53	0.00	0.00		27.53

Total Uncontrolled Potential Emissions based on rated capacity assuming operations at 8,760 hours per year.

**Limited Emissions (tons/year)**

**Emissions Generating Activity**

Pollutant	Combustion	Surface Coating & Misc. VOC Usage	Welding	Woodworking		Total
PM	0.20	3.06	0.01	1.05		4.32
PM-10	0.20	3.06	0.01	1.05		4.32
SO2	0.01	0.00	0.00	0.00		0.01
NOx	1.72	0.00	0.00	0.00		1.72
VOC	0.13	80.37	0.00	0.00		80.50
CO	0.47	0.00	0.00	0.00		0.47
Single HAP	0.00	12.66	0.00	0.00		12.66
Total HAPs	0.00	27.53	0.00	0.00		27.53

Total Limited Emissions based on rated capacity assuming limited operations, after controls.

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations and Miscellaneous VOC Usage**

Company Name: SunnyBrook RV, Inc.  
Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540  
Part 70 No.: T039-7803  
Plant ID: 039-00444  
Reviewer: Michael Hirtler  
Date: December 16, 1997

Potential Uncontrolled Emissions:																	
Coating Material (as applied)	Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<b>Glue Operation (FUG26,39,40,44)</b>																	
General Purpose Adhesive	Fiberglass Insulation Panels	6.10	64.10%	0.00%	64.10%	0.00%	16.00%	0.831	1.51	3.91	3.91	4.91	117.75	21.49	3.01	24.44	75%
Lacquer Thinner		6.52	100.00%	0.00%	100.00%	0.00%	0.00%	0.04	(gal/hr)	6.52	6.52	0.26	6.26	1.14	0.00	ERR	100%
Mineral Spirits		6.62	100.00%	0.00%	100.00%	0.00%	0.00%	0.2	(gal/hr)	6.62	6.62	1.32	31.78	5.80	0.00	ERR	100%
												<b>6.49</b>	<b>155.79</b>	<b>28.43</b>	<b>3.01</b>		
<b>Stain Touch Up of Prefinished Cabinets (FUG45-49)</b>																	
	Wood Cabinets	9.70	74.10%	66.00%	8.10%	65.00%	24.98%	0.01226	1.51	2.24	0.79	<b>0.01</b>	<b>0.35</b>	<b>0.06</b>	<b>0.05</b>	3.15	75%
<b>Miscellaneous Coating Operations</b>																	
<i>General Plant-wide Sealant &amp; Adhesive Usage</i>																	
Sikaflex 221 for Misc. Sealing (FUG53)	Carpeting/Panelling/ Plastics/Linoleum/	10.00	9.00%	0.00%	9.00%	0.00%	90.00%	1.6	1.51	0.90	0.90	2.11	50.62	9.24	0.00	1.00	100%
Adhesive in Roof Sealing Operations (FUG52)	Roofing Materials	7.25	37.00%	0.00%	37.00%	0.00%	63.00%	0.0402	1.51	2.68	2.68	0.16	3.91	0.71	0.00	4.26	100%
Plastic Pipe Cement (FUG50)		7.08	78.00%	0.00%	78.00%	0.00%	21.00%	0.1022	1.51	5.52	5.52	0.85	20.45	3.73	0.00	26.30	100%
Linoleum Paste	14	(pounds used 1996) / 1920		(1996 oper. hours) =								0.01	0.18	0.03	0.00		
Silicone Sealant	2739	(pounds used 1996) / 1920		(1996 oper. hours) =								1.43	34.24	6.25	0.00		
Dow Corning Silicone Sealant	351	(pounds used 1996) / 1920		(1996 oper. hours) =								0.18	4.39	0.80	0.00		
Adhesive Kanrol	3274	(pounds used 1996) / 1920		(1996 oper. hours) =								1.71	40.93	7.47	0.00		
Geosel Sealant	517	(pounds used 1996) / 1920		(1996 oper. hours) =								0.27	6.46	1.18	0.00		
												<b>6.72</b>	<b>161.17</b>	<b>29.41</b>	<b>0.00</b>		
<i>Metal Coating</i>																	
Aerosol Touch-Up Paint (Metal Trailer Frames)	370	(pounds used 1996) / 1920		(1996 oper. hours) =								0.19	4.63	0.84	0.00		
Undercoating	13	(pounds used 1996) / 1920		(1996 oper. hours) =								0.01	0.16	0.03	0.00		
Rectorseal Pipe Thread Compound (Metal Pipe)	16	(pounds used 1996) / 1920		(1996 oper. hours) =								0.01	0.20	0.04	0.00		
												<b>0.21</b>	<b>4.99</b>	<b>0.91</b>	<b>0.00</b>		
<i>Solvent Usage</i>																	
Source-wide Clean Up with Mineral Spirits (FUG51)		6.62	100.00%	0.00%	100.00%	0.00%	0.00%	0.581	(gal/hr)	6.62	6.62	<b>3.85</b>	<b>92.31</b>	<b>16.85</b>	<b>0.00</b>	ERR	100%
<b>Miscellaneous Materials Containing VOCs</b>																	
Sikaflex Glass Primer	11	(pounds used 1996) / 1920		(1996 oper. hours) =								0.01	0.14	0.03	0.00		
Glass Cleaner	249	(pounds used 1996) / 1920		(1996 oper. hours) =								0.13	3.11	0.57	0.00		
Dry Lubricant	104	(pounds used 1996) / 1920		(1996 oper. hours) =								0.05	1.30	0.24	0.00		
Silicone Lubricant	233	(pounds used 1996) / 1920		(1996 oper. hours) =								0.12	2.91	0.53	0.00		
Lacquer Thinner	1455	(pounds used 1996) / 1920		(1996 oper. hours) =								0.76	18.19	3.32	0.00		
												<b>1.07</b>	<b>25.65</b>	<b>4.68</b>	<b>0.00</b>		
<b>Total Uncontrolled Potential Emissions:</b>												<b>18.35</b>	<b>440.39</b>	<b>80.37</b>	<b>3.06</b>		

**Methodology:**

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

**Appendix A: Emission Calculations  
Natural Gas Combustion Only**

**Company Name:** SunnyBrook RV, Inc.  
**Address City IN Zip:** 11756 CR 14, Middlebury, Indiana 46540  
**Part 70 No.:** T039-7803  
**Plant ID:** 039-00444  
**Reviewer:** Michael Hirtler  
**Date:** December 16, 1997

Combustion Unit Type	Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
SB-016 Space Heater	0.08	0.70	11.17	11.17	0.6	94.0	11.0	40.0	0.00	0.00	0.00	0.03	0.00	0.01
SB-017 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-018 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-019 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-020 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-021 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-022 Space Heater	0.16	1.40	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-023 Space Heater	0.10	0.88	11.17	11.17	0.6	94.0	11.0	40.0	0.01	0.01	0.00	0.07	0.01	0.03
SB-024 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-025 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-026 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-027 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-028 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-029 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
SB-030 Space Heater	0.40	3.50	11.9	11.9	0.6	100.0	5.8	21.0	0.02	0.02	0.00	0.18	0.01	0.04
Total Potential Emissions in tons/yr	3.94	34.51							0.20	0.20	0.01	1.72	0.13	0.47

**Methodology**

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x Number x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission factors from AP 42, Supplement B of 5th Edition, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, for residential (< 0.3 MMBtu/hr) and commercial (>= 0.3 & < 10.0 MMBtu/hr) combustion units.

Company Name: SunnyBrook RV, Inc.  
 Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540  
 Part 70 No.: T039-7803  
 Plant ID: 039-00444  
 Reviewer: Michael Hirtler  
 Date: December 16, 1997

Emission Unit ID	Stack ID	Emission Unit Description	Outlet Grain Loading (gr/acf)	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	PM Control Efficiency (%)	Potential PM Emission Rate			Process Weight Rate (lb/hr)	Allowable PM Emission Rate Based on 326 IAC 6-3-2 (lb/hr)
							Before Controls (tons/yr)	After Controls (tons/yr)	After Controls (lb/hr)		
EU-1	SV-1	Pin Router SB-001	0.000289	30.3	62.8	99.0%	0.021	0.021	0.0047	85.0	0.494
EU-2	SV-2	12" Tablesaw SB-002	0.000228	72.7	33	99.0%	0.021	0.021	0.0047	120.0	0.623
EU-3	SV-43	7x7 Panel Saw	0.00036	30.3	6.28	99.0%	0.003	0.003	0.0006	150.0	0.723
EU-4	SV-3	Cut Off Saw SB-004	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	100	0.551
EU-5	SV-4	10" Chop Saw	0.0000721	76.4	12.566	99.0%	0.003	0.003	0.0006	50	0.346
EU-6	SV-4	10" Radial Chop Saw	0.0000721	76.4	12.566	99.0%	0.003	0.003	0.0006	50	0.346
EU-7	SV-5	Hand Router System SB-007	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	(1)	0.000
EU-8	SV-5	Hand Router System SB-008	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	30	0.246
EU-9	SV-6	Hand Router System SB-009	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	15	0.155
EU-10	SV-7	Hand Router System SB-010	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	10	0.118
EU-11	SV-7	Hand Router System SB-011	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	10	0.118
EU-12	SV-8	Hand Router System SB-012	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	(2)	0.000
EU-13	SV-8	Hand Router System SB-013	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	20	0.187
EU-14	SV-9	Hand Router System SB-014	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	(3)	0.000
EU-15	SV-9	Hand Router System SB-015	0.00052	130	(acfm)	95.0%	0.003	0.003	0.0006	25	0.218
N/A	FUG25	Cut Off Saw SB-031	0.005	(lb sawdust / hour)		50.0%	0.011	0.011	0.0025	5	0.074
N/A	FUG27	14" Band Saw SB-033	0.0005	(lb sawdust / hour)		50.0%	0.001	0.001	0.0003	2	0.040
N/A	FUG28	Chop Saw SB-034	0.005	(lb sawdust / hour)		50.0%	0.011	0.011	0.0025	10	0.118
N/A	FUG29	14" Mitre Saw SB-035	0.005	(lb sawdust / hour)		50.0%	0.011	0.011	0.0025	10	0.118
N/A	FUG30	14" Band Saw SB-036	0.0005	(lb sawdust / hour)		50.0%	0.001	0.001	0.0003	2	0.040
N/A	FUG31	14" Chop Saw SB-037	0.004	(lb sawdust / hour)		50.0%	0.009	0.009	0.0020	15	0.155
N/A	FUG32	10" Chop Saw SB-038	0.004	(lb sawdust / hour)		50.0%	0.009	0.009	0.0020	30	0.246
N/A	FUG33	10" Chop Saw SB-039	0.08	(lb sawdust / hour)		50.0%	0.175	0.175	0.0400	85	0.494
N/A	FUG34	10" Chop Saw SB-040	0.007	(lb sawdust / hour)		50.0%	0.015	0.015	0.0035	50	0.346
N/A	FUG35	14" Band Saw SB-041	0.0025	(lb sawdust / hour)		50.0%	0.005	0.005	0.0013	10	0.118
N/A	FUG36	10" Cut Off Saw SB-042	0.08	(lb sawdust / hour)		50.0%	0.175	0.175	0.0400	80	0.474
N/A	FUG37	14" Chop Saw SB-043	0.125	(lb sawdust / hour)		50.0%	0.274	0.274	0.0625	70	0.434
N/A	FUG38	14" Chop Saw SB-044	0.125	(lb sawdust / hour)		50.0%	0.274	0.274	0.0625	70	0.434
<b>326 IAC 6-3-2 Allowable Emission Rate for Process Weight Rates up to 60,000 lb/hr =</b>											
$4.1 * P^{0.67}$ where P = process weight rate in tons/hour											
<b>Total PM Emission Rate:</b>							1.046	1.046			

Methodology:

For Woodworking Operations:

EU-1 to EU-15:

Potential emissions before controls (tons/yr) = (gr / acf) (lb / 7000 gr) (acf / min OR acfm/ft<sup>2</sup> \* ft<sup>2</sup>) (60 min / hr) (8760 hr / yr) (ton / 2000 lb) (1 - efficiency)  
 Potential emissions after controls (tons/yr) = (gr / acf) (lb / 7000 gr) (acf / min OR acfm/ft<sup>2</sup> \* ft<sup>2</sup>) (60 min / hr) (8760 hr / yr) (ton / 2000 lb) (1 - efficiency)

FUG25 to FUG38:

Potential emissions before controls (tons/yr) = (lb sawdust / hour) (8760 hr / yr) (ton / 2000 lb) (1 - efficiency)  
 Potential emissions after controls (tons/yr) = (lb sawdust / hour) (8760 hr / yr) (ton / 2000 lb) (1 - efficiency)

(FUG25 to FUG38 operations are uncontrolled, however, a 50% enclosure efficiency was assumed for the production building)

(For woodworking operations emission controls are assumed to be part of, or integral to the process; therefore, potential emissions before controls = potential emissions after controls)

Notes:

- (1). Total process weight rate going to EU-7 and EU-8 is 30 pounds per hour.
- (2). Total process weight rate going to EU-12 and EU-13 is 20 pounds per hour.
- (3). Total process weight rate going to EU-7 and EU-8 is 25 pounds per hour.

All particulate matter is assumed equal to PM-10.

**Appendix A: Emission Calculations  
Welding and Cutting**

**Company Name:** SunnyBrook RV, Inc.  
**Address City IN Zip:** 11756 CR 14, Middlebury, Indiana 46540  
**Part 70 No.:** T039-7803  
**Plant ID:** 039-00444  
**Reviewer:** Michael Hirtler  
**Date:** December 16, 1997

Type of Operation	Maximum Throughput (lb/hr)	Emission Factors					Emissions				
		PM (lb/lb)	PM-10 (lb/lb)	Manganese (lb/lb)	Nickel (lb/lb)	Chromium (lb/lb)	PM tons/yr	PM-10 tons/yr	Manganese tons/yr	Nickel tons/yr	Chromium tons/yr
Stick Welding (FUG-41)	0.03125	0.0370	0.0370	0.0030	0.0000	0.0000	0.01	0.01	0.00	0.00	0.00
Stick Welding (FUG-42)	0.03125	0.0370	0.0370	0.0030	0.0000	0.0000	0.01	0.01	0.00	0.00	0.00
				TOTAL POTENTIAL			0.01	0.01	0.00	0.00	0.00

**Methodology:**

Maximum Throughput = maximum hourly wire/electrode consumption for welding (lbs/hour). For each welding operation, this reflects 0.5 electrodes/hr and 1 oz. electrode weight  
 Emissions (tons/yr) = maximum throughput (lbs/hr) \* emission factor (lb pollutant/lb electrode) \* (8,760 hr/yr) \* (1 ton/2,000 lbs)  
 Emission factors from U.S.EPA's SARA Reporting Guide.  
 Total particulates assumed equal to PM-10.

Appendix A: HAP Emission Calculations

Company Name: SunnyBrook RV, Inc.  
 Address City IN Zip: 11756 CR 14, Middlebury, Indiana 46540  
 Part 70 No.: T039-7803  
 Plant ID: 039-00444  
 Reviewer: Michael Hirtler  
 Date: December 16, 1997

Material (as applied)	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Hexane	Weight % Cumene	Weight % Glycol Ethers	Weight % Methanol	Weight % Methyl Ethyl Ketone	HAP EMISSION RATES (TONS PER YEAR)								
												Xylene	Toluene	Ethylbenzene	Hexane	Cumene	Glycol Ethers	Methanol	Methyl Ethyl Ketone	Total All HAPs
General Purpose Adhesive	6.10	0.831	1.51	0.00%	0.00%	0.00%	28.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	9.39	0.00	0.00	0.00	0.00	9.39
Lacquer Thinner (glue operation)	6.52	0.04	(gal/hr)	0.00%	20.29%	0.00%	0.00%	0.00%	2.25%	0.00%	0.00%	0.00	0.23	0.00	0.00	0.00	0.03	0.00	0.00	0.26
Stain (WB-202)	9.70	0.01226	1.51	0.00%	0.00%	0.00%	0.00%	0.00%	8.10%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.06
Plastic Pipe Cement	7.08	0.1022	1.51	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	80.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.83	3.83
Sikaflex 221 for Misc. Sealing	10.00	1.6	1.51	6.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.16	0.00	3.08	0.00	0.00	0.00	0.00	0.00	9.24
Adhesive Kanrol	6.10	2.67	(lb/hr)	0.00%	0.00%	0.00%	28.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	3.27	0.00	0.00	0.00	0.00	3.27
Aerosol Touch-Up Paint	9.01	0.23	(lb/hr)	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.15
Sikaflex Glass Primer	7.60	0.01	(lb/hr)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.04
Rectorseal Pipe Thread Compound	11.68	0.06	(lb/hr)	0.00%	0.00%	0.00%	0.00%	0.00%	16.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.04
Geosel Sealant	7.92	0.77	(lb/hr)	4.91%	0.00%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.17	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.24
Lacquer Thinner (general usage)	6.52	1.02	(lb/hr)	0.00%	20.29%	0.00%	0.00%	0.00%	2.25%	0.00%	0.00%	0.00	0.91	0.00	0.00	0.00	0.10	0.00	0.00	1.01
Total Uncontrolled Potential Emissions:												6.32	1.29	3.08	12.66	0.07	0.23	0.04	3.83	27.53

**METHODOLOGY**

Uncontrolled HAP emission rate (tons/year):  
 For General Purpose Adhesive, Lacquer Thinner (glue operation), Stain, Pipe Cement & Sikaflex for General Sealant:  
 Uncontrolled HAP emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
 For Adhesive Kanrol, Aerosol Touch-Up Paint, Sikaflex Glass Primer, Rectorseal Pipe Compound, Geosel Sealant & Lacquer Thinner (general usage):  
 Uncontrolled HAP emission rate (tons/yr) = lb VOC/gal from Page 2 of 6 \* 1/Weight % of Organics \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Material Safety Data Sheet for Stain (WB-202) did not provide weight percent of the listed HAP. It was therefore assumed that the listed HAP was 100% of the organic content of the material.