CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Freedom One
28936 Phillips Street
Elkhart, Indiana 46514

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.:CP-039-8080-00445	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information

The Permittee owns and operates a van conversion operation to accommodate the physically challenged.

Responsible Official:	Christy Miller
Source Address:	28936 Phillips Street, Elkhart, Indiana 46514
Mailing Address:	28936 Phillips Street, Elkhart, Indiana 46514
SIC Code:	7532
County Location:	Elkhart
County Status:	Attainment for all other criteria pollutants
Source Status:	Minor Source, under PSD Rules Minor Source, under Title V Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Nine (9) natural gas fired radiant heaters, with a maximum heat input capacity of 0.125 mmBtu/hr each and exhausts to the atmosphere.

(b) One (1) natural gas fired air make-up unit, with a total maximum heat input capacity of 2.7 mmBtu/hr and exhausts to the atmosphere.

(c) One (1) welding operation area consisting of the following equipment:

1. Thirty (30) Metal Inert Gas (MIG) stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
2. One (1) Stick welding station, with a maximum throughput of 2 lbs/hr and exhausts to the atmosphere.
3. Four (4) Tungsten Inert Gas stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
4. Two (2) Oxyacetylene welding station, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
5. One (1) plasma flame-cutting station, with a maximum metal thickness cut of 0.25 inches, a maximum metal cutting rate of 20 inches/minute and exhausts to the atmosphere.

(d) One (1) portable pump spray system for the undercoat application area, maximum throughput of 4 units/day and exhausts to a stack with a flow rate of 12,100 acfm.

(e) One (1) hot melt adhesive application area, maximum throughput of 4 units/day and exhausts to the atmosphere.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is not a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

(b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

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

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.11, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1 (Fees).

Operation Conditions

B.6 General Operation Conditions

(a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

(b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

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

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

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this custom resin production operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

(b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

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

B.10 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.11 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

Emission Limitation and Standards

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

(a) The total source potential emissions of particulate matter (PM) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential emissions to the following:

(a) 25 tons per year or more (326 IAC 2-1),

(b) 100 tons per year or more, and are greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),

(c) 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Operation of Equipment [326 IAC 2-1-3]

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.4 Stack Height [326 IAC 1-7]

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

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

C.5 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

C.6 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

(3) 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

(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.

Record Keeping Requirements

C.7 General Record Keeping Requirements [326 IAC 2-1-3]

(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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(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.

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

Stratospheric Ozone Protection

C.8 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

(a) Nine (9) natural gas fired radiant heaters, with a maximum heat input capacity of 0.125 mmBtu/hr each and exhausts to the atmosphere.

(b) One (1) natural gas fired air make-up unit, with a total maximum heat input capacity of 2.7 mmBtu/hr and exhausts to the atmosphere.

(c) One (1) welding operation area consisting of the following:

1. Thirty (30) Metal Inert Gas (MIG) stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
2. One (1) Stick welding station, with a maximum throughput of 2 lbs/hr and exhausts to the atmosphere.
3. Four (4) Tungsten Inert Gas stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
4. Two (2) Oxyacetylene welding station, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
5. One (1) plasma flame-cutting station, with a maximum metal thickness cut of 0.25 inches, a maximum metal cutting rate of 20 inches/minute and exhausts to the atmosphere.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the following applies:

(a) The allowable emissions shall for the welding operations shall not exceed 4.12 lbs/hr.

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

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

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

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 3-2.1]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2 FACILITY CONDITIONS

(a) One (1) portable pump spray system for the undercoat application area, maximum throughput of 4 units/day and exhausts to a stack with a flow rate of 12,100 acfm.

(b) One (1) hot melt adhesive application area, maximum throughput of 4 units/day and exhausts to the atmosphere.

Emissions Limitation and Standards

D.2.1 PM Process Operations [326 IAC 6-3]:

Pursuant to 326 IAC 6-3 (Process Operations), the undercoat pump spray system shall have a PM allowable emissions using the following equation:

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

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

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.2.3 Performance Testing [326 IAC 3-2.1]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping Requirements

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?_____, 100 LBS/HR VOC ?_____, 100 LBS/HR SULFUR DIOXIDE ?_____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?_____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Freedom One PHONE NO. (219) 262-8439

LOCATION: (CITY AND COUNTY) Elkhart, Elkhart
PERMIT NO. 039-8080 AFS PLANT ID: 039-00445 AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____
__

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

_____
__

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____
_____
_____

MALFUNCTION REPORTED BY:
_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____DATE:_____TIME:_____
FAX NUMBER - 317 233-5967

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO2, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Freedom One
Source Location:	28936 Phillips Street, Elkhart, IN. 46514
County:	Elkhart
Construction Permit No.:	CP-039-8080-00445
SIC Code:	7532
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Freedom One relating to the construction and operation of conversion of van units to accommodate the physically challenged, consisting of the following equipment:

(a) Nine (9) natural gas fired radiant heaters, with a maximum heat input capacity of 0.125 mmBtu/hr each and exhausts to the atmosphere.

(b) One (1) natural gas fired air make-up unit, with a total maximum heat input capacity of 2.7 mmBtu/hr and exhausts to the atmosphere.

(c) One (1) welding operation area consisting of the following equipment:

1. Thirty (30) Metal Inert Gas (MIG) stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
2. One (1) Stick welding station, with a maximum throughput of 2 lbs/hr and exhausts to the atmosphere.
3. Four (4) Tungsten Inert Gas stations, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
4. Two (2) Oxyacetylene welding station, with a maximum consumption of wire per station of 3 lbs/hr and exhausts to the atmosphere.
5. One (1) plasma flame-cutting station, with a maximum metal thickness cut of 0.25 inches, a maximum metal cutting rate of 20 inches/minute and exhausts to the atmosphere.

(d) One (1) portable pump spray system for the undercoat application area, maximum throughput of 4 units/day, controlled by dry filters for overspray and exhausts to a stack with a flow rate of 12,100 acfm.

(e) One (1) hot melt adhesive application area, maximum throughput of 4 units/day and exhausts to the atmosphere.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	Undercoat area	24	3	12,100	70

Recommendation

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

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

An application for the purposes of this review was received on January 15, 1997, with additional information received on May 6, 1998.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (Four (4) pages).

OAM has determined that there are no emissions from the hot melt application area.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	30.69	30.69
Particulate Matter (PM10)	30.69	30.69
Sulfur Dioxide (SO_2)	--	0.01
Volatile Organic Compounds (VOC)	--	4.56
Carbon Monoxide (CO)	--	0.35
Nitrogen Oxides (NO_x)	--	1.67
Chromium Compounds	--	0.29
Manganese Compounds	--	1.45
Nickel Compounds	--	0.0001
Combination of HAPs	--	1.74

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.

The undercoat pump spray system and welding operations shall comply with 326 IAC 6-3-2(c) using the following equation:

E = 4.10P^0.67; where P = process weight in tons per hour
E = rate of emission in pounds per hour.

Total allowable PM emissions = 18.04 tons/yr (welding operations)+ 0.06 ton/yr (radiant heaters) + 0.14 ton/yr (air make-up unit) + 12.45 ton/yr (undercoat) = 30.69 ton/yr.

The source is in compliance with 326 IAC 6-3-2 because the potential PM emissions of 30.69 ton/yr is equal to the allowable PM emissions of 30.69 ton/yr.

(b) The potential emissions before control are equal to the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of PM and VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for NO_x, SO_2, PM and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	30.69
PM10	30.69
SO_2	0.01
VOC	4.56
CO	0.35
NO_x	1.67
Chromium Compounds	0.29
Manganese Compounds	1.45
Nickel Compounds	0.0001
Combination HAPs	1.74

(a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards 40 CFR Part 60 applicable to these facilities.

(b) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The dry filters for particulate matter overspray control shall be in operation at all times when the undercoat pump spray system is in operation.

(b) The pump spray system and welding operations shall comply with 326 IAC 6-3-2(c) using the following equation:

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

(c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps shall be considered a violation of this construction permit.

(d) Weekly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an over spray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps shall be considered a violation of this construction permit.

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

The source is in compliance with 326 IAC 6-3 because the potential PM emissions of 30.69 tons/yr is equal to the allowable PM emissions of 30.69 tons/yr.

326 IAC 1-6-3 (Preventive Maintenance):

(a) 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:

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

(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.

(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 and OAM upon request and shall be subject to review and approval by IDEM and OAM.

Even though the undercoat pump system was constructed after July 1, 1990 and has VOC emissions greater than 15 lbs/day, 326 IAC 8-2-9 does not apply to the facility because it coats metal parts or products under the Standard Industrial Classification Code of 7532 and not under any of the major groups of #33, #34, #35, #36, #37, #38 and #39.

326 IAC 8-1-6 does not apply because the potential VOC emissions are less than 25 tons per year.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 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) Construction Permit Application Form Y.

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

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

(c) 326 IAC 2-1-3.4 (New Source Toxics Control) does not apply to the source because a single HAPs is less than 10 tons/yr and combination HAPs is less than 25 tons/yr.

Conclusion

The construction of this conversion of van units to accommodate the physically challenged will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-8080-00445.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	Freedom One
Source Location:	28936 Phillips Street, Elkhart, IN. 46514
County:	Elkhart
Construction Permit No.:	CP-039-8080-00445
SIC Code:	7532
Permit Reviewer:	Nysa L. James

On May 22, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, 300 South 2nd Street, Elkhart, Indiana, stating that Freedom One had applied for a construction permit to construct and operate a van conversion operation. 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 June 23, 1998, Freedom One submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: Regarding Condition D.2.4 Particulate Matter (PM), there is no direct exhaust for particulate matter control. Therefore, no dry filters are available for operation.

Response 1: Since there is not a dry filter to control particulate matter overspray, Condition D.2.4 shall be deleted and the conditions following the above referenced condition shall be re-numbered to reflect this change.

Comment 2: Regarding Condition D.2.5 Monitoring, there is no direct exhaust for particulate matter control. Therefore, no daily inspections should be required. There is no stack and therefore, no weekly inspections should be required.

Response 2: Since there is not a dry filter to control particulate matter overspray, Condition D.2.5 shall be deleted and the conditions following the above referenced condition shall be re-numbered to reflect this change.

Comment 3: Regarding Condition D.2.6 Record Keeping Requirements, there is no direct exhaust for particulate matter control. Therefore, no daily inspections should be required and there will be nothing to record on daily reports.

Response 3: Since there is not a dry filter to control particulate matter overspray, Condition D.2.6 shall be deleted and the conditions following the above referenced condition shall be re-numbered to reflect this change.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Air Make-Up Unit

Company Name: **Freedom One**
Address City IN Zip: **28936 Phillips Street, Elkhart Indinana 46514**
CP: **039-8080**
Plt ID: **039-00445**
Reviewer: NLJ
Date: 4/7/98

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.7	23.7

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.14	0.14	0.01	1.18	0.06	0.25

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

HAP Emission Calculations

Company Name: Freedom One
Plant Location: 28936 Phillips Street, Elkhart Indinana 46514
County: Elkhart
Permit Reviewer: NLJ
Date: 4/13/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Chromium Compounds	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Chromium Compounds Emissions (ton/yr)
Reducer BSC600	7.3	0.375000	0.50	29.00%	38.00%	0.00%	0.00%	5.00%	0.00%	1.74	2.28	0.00	0.00	0.30	0.00
Primer E2G980	8.8	0.250000	0.50	4.00%	5.00%	0.00%	9.00%	0.00%	6.00%	0.19	0.24	0.00	0.43	0.00	0.29
Reducer R7K981	6.8	0.125000	0.50	4.00%	0.00%	0.00%	41.00%	0.00%	0.00%	0.07	0.00	0.00	0.76	0.00	0.00
CC630	7.7	0.190000	0.50	4.00%	2.00%	23.00%	0.00%	0.00%	0.00%	0.13	0.06	0.74	0.00	0.00	0.00
CCR660	7.2	0.083000	0.50	0.00%	74.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.97	0.00	0.00	0.00	0.00
CCH690	8.7	0.041000	0.50	22.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.17	0.00	0.00	0.00	0.03	0.00
Total State Potential Emissions										**2.31**	**3.55**	**0.74**	**1.20**	**0.33**	**0.29**

METHODOLOGY

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

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Nine (9) radiant heaters

Company Name: **Freedom One**
Address City IN Zip: **28936 Phillips Street, Elkhart Indinana 46514**
CP: **039-8080**
Plt ID: **039-00445**
Reviewer: NLJ
Date: 4/7/98

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.1	9.9

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.06	0.06	0.00	0.49	0.03	0.10

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

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

Company Name: Freedom One
Address City IN Zip: 28936 Phillips Street, Elkhart Indinana 46514
CP: 039-8080
Plt ID: 039-00445
Reviewer: NLJ
Date: 4/13/98

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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
Adhesive - Con-Bond Benders 604	10.9	89.20%	0.0%	89.2%	0.0%	11.40%	1.00	0.50	9.72	9.72	4.86	116.67	21.29	1.29	85.29	50%
Adhesive - Aersol	0.2	80.00%	0.0%	80.0%	0.0%	20.00%	0.05	0.50	0.15	0.15	0.00	0.08	0.02	0.00	0.75	50%

State Potential Emissions	**Add worst case coating to all solvents**	**4.86**	**116.76**	**21.31**	**1.29**

METHODOLOGY

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

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

Company Name: Freedom One
Address City IN Zip: 28936 Phillips Street, Elkhart Indinana 46514
CP: 039-8080
Plt ID: 039-00445
Reviewer: NLJ
Date: 4/7/98

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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
Columbia WR #524 Blk	8.5	68.92%	53.9%	15.0%	55.1%	14.98%	0.75000	0.500	2.83	1.27	0.48	11.43	2.09	2.16	8.48	50%
Undecoat 79334 Quaker	9.0	48.00%	42.0%	6.0%	47.0%	44.80%	2.00000	0.500	1.02	0.54	0.54	13.02	2.38	10.29	1.21	50%

State Potential Emissions	**Add worst case coating to all solvents**	**1.02**	**24.45**	**4.46**	**12.46**	

METHODOLOGY

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

Appendix A: Emissions Calculations

Company Name: Freedom One
Address City IN Zip: 28936 Phillips Street, Elkhart Indinana 46514
CP: 039-8080
Plt ID: 039-00445
Reviewer: NLJ
Date: 4/8/98

1. From Welding Process

Number of Welding Stations	Maximum Throughput of Weld Wire/Metal (lbs/yr)	Maximum Wire/Metal Consumed per Station (lbs/hr)	Electrode Type	PM-10 0.037 (tons/yr)	HAP Cr -- (tons/yr)	HAP Mn 0.003 (tons/yr)	HAP Ni -- (tons/yr)
MIG (30)	788400	90	Default	14.59	0.00	1.18	0.00
Stick (1)	17520	2	Default	0.32	0.00	0.03	0.00
TIG (4)	105120	12	Default	1.94	0.00	0.16	0.00
Oxyacetylene	52560	6	Default	0.97	0.00	0.08	0.00
Total				17.83	0.00	1.45	0.00

METHODOLOGY

Emission factors are from the SARA Reporting Gude where emission factors are in lb pollutant/lb electrode.
Throuput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)
Pollutant Emission (tons/yr) =Throuput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

2. From flame-cutting

Number of Station	Maximum Throughput of Cutting Metal (kin/yr)	Maximum Metal Thickness Cut (in)	Maximum Metal Cutting Rate (in/min)	PM-10 0.1622 (tons/yr)	HAP Cr 0.0003 (tons/yr)	HAP Mn 0.0005 (tons/yr)	HAP Ni 0.0001 (tons/yr)
1	2628.00	0.25	20.00	0.2131	0.0004	0.0007	0.0001

METHODOLOGY *

Emission factors are from SARA 313 Reporting Guide, the units are lbs/kin of metal cutted
Throuput (kin/yr) = Station Number *Maximum Metal Thickness cut (in)/1(in)* Maximum Metal Cutting Rate (in/min)*60(min/hr) * 8760 (hrs/yr)/1000
Pollutant Emission (tons/yr) =Throuput (kin/yr) * Emission factor (lbs/ kin)/2000 (lbs/ton)
* NOTE: The Methodology are from SARA Reporting Guide