

**CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT**

**Dynamax Corporation  
3733 Lexington Park Drive  
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-039-8896-00466	
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

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The Permittee owns and operates a motor home production plant which involves the installation of the floor, sidewalls, roof, backwall, frontcap, window, cabinets, insulation, and carpet onto the chassis.

Responsible Official: Michael Givler  
Source Address: 3733 Lexington Park Drive, Elkhart, Indiana 46514  
Mailing Address: P. O. Box 1647, Elkhart, Indiana 46515  
SIC Code: 3716  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Six (6) natural gas-fired radiant heaters, R1 through R6, each has a heat input capacity of 0.06 million British thermal units per hour (mmBtu/hr),
- (b) Four (4) natural gas-fired radiant heaters, R7 through R10, each has a heat input capacity of 0.08 mmBtu/hr,
- (c) Four (4) natural gas-fired radiant heaters, R11 through R14, each has a heat input capacity of 0.1 mmBtu/hr,
- (d) One (1) natural gas-fired radiant heater, R15 with a heat input capacity of 0.115 mmBtu/hr,
- (e) Two (2) radiant heaters, R16 and R17, each has a heat input capacity of 0.4 mmBtu/hr,
- (f) Welding operation; five (5) steel MIG welding stations, each is capable of using 8.8 pounds of wire per hour (lb/hr), one (1) aluminum welding station, which is capable of using 0.4 lb wire/hr, two (2) oxyacetylene flame cutters, each with a total cutting rate of 28 inches per minute, and one (1) plasma cutter, with a cutting rate of 155 inches per minute,
- (g) Woodworking operation with a maximum throughput of 724 pounds of wood per hour, which consists of various woodworking equipment, and
- (h) One (1) paint booth, PB-1, which is capable of painting 0.5 motor home per hour. This facility is equipped with air assisted airless guns. The particulate matter overspray will be controlled by dry filters.

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

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This stationary source will be 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).

## **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**

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- (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]**

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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)]**

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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]**

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Notwithstanding Construction Condition No. 6, 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]**

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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)    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 2-7-19 (Fees).
- (e) The Permittee by itself is subject to the requirement of Part 70 permit. Glaval Corporation has submitted their Part 70 application (T-039-6955-00126) on October 18, 1996. The facilities in this application shall be incorporated in the Part 70 permit application.

## Operation Conditions

### B.6 General Operation Conditions

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- (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]

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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 Transfer of Permit [326 IAC 2-1-6]

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

- (a) In the event that ownership of this motor home production 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.9 Permit Revocation [326 IAC 2-1-9]**

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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.10 Availability of Permit [326 IAC 2-1-3(l)]**

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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]

The total source potential emissions of volatile organic compounds (VOC) 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.

#### 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 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.4 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment

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.7 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.8 Compliance Monitoring

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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 shall notify:

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, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

### C.9 Maintenance of Monitoring Equipment

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### C.10 Monitoring Methods [326 IAC 3]

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Any monitoring or testing performed to meet the 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.

### C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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- (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 and Reporting Requirements**

### **C.12 Annual Emission Reporting [326 IAC 2-6]**

That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement 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 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

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

### C.13 Monitoring Data Availability

- (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.14 General Record Keeping Requirements

- (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.15 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 CONDITIONS

- (a) Six (6) natural gas-fired radiant heaters, R1 through R6, each has a heat input capacity of 0.06 million British thermal units per hour (mmBtu/hr),
- (b) Four (4) natural gas-fired radiant heaters, R7 through R10, each has a heat input capacity of 0.08 mmBtu/hr,
- (c) Four (4) natural gas-fired radiant heaters, R11 through R14, each has a heat input capacity of 0.1 mmBtu/hr,
- (d) One (1) natural gas-fired radiant heater, R15 with a heat input capacity of 0.115 mmBtu/hr,
- (e) Two (2) radiant heaters, R16 and R17, each has a heat input capacity of 0.4 mmBtu/hr,
- (f) Welding operation; five (5) steel MIG welding stations, each is capable of using 8.8 pounds of wire per hour (lb/hr), one (1) aluminum welding station, which is capable of using 0.4 lb wire/hr, two (2) oxyacetylene flame cutters, with a total cutting rate of 28 inches per minute, and one (1) plasma cutter, with a cutting rate of 155 inches per minute,
- (g) Wood working operation with a maximum throughput of 724 pounds of wood per hour, which consists of various wood working equipment, and
- (h) One (1) paint booth, PB-1, which is capable of painting 0.5 motor home per hour. This facility is equipped with air assisted airless guns. The particulate matter overspray will be controlled by dry filters.

### Emissions Limitation and Standards

#### D.1.1 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9]

Any change or modification which may increase the VOC actual emissions to 15 pounds per day or more before add-on controls from the metal chassis painting, shall require prior approval.

#### D.1.2 Volatile Organic Compounds (General Reduction Requirements) [326 IAC 8-1-6]

Any change or modification which may increase each facility VOC potential emissions to 25 tons per year or more from the side wall gluing, fiberglass lay-up, undercoating operation, hood and door adhesive coating operation, and the headliner assembly shall require prior approval and be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

#### D.1.3 Volatile Organic Compounds (Surface Coating Limitation: Wood Furniture and Cabinet Coating) [326 IAC 8-2-12]

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

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a

substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.1.4 PM process operation (326 IAC 6-3):**

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

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

Where: E = PM allowable emissions in pounds hour  
 P = Process weight rate in tons per hour

Facility/Operation	Process Weight Rate (ton/hr)	PM Allowable Emissions (lb/hr)
Woodworking	0.381	2.14
Welding	0.022	0.32
Paint Booth, PB-1	PM Allowable Emissions to be determined using the above equation	

**Compliance Monitoring Requirements**

**D.1.5. Preventive Maintenance Plan**

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

**D.1.6 Volatile Organic Compounds**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and C.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, 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.1.7 Particulate Matter (PM)**

The dry filters for particulate matter overspray control shall at all times be in placed when paint booth, PB-1 is in operation.

**D.1.8 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray 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 in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

## **Record Keeping and Reporting Requirements**

### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, and D.1.2 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Conditions D.1.1, and D.1.2.
  - (1) The amount of VOC and HAP 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 from the metal chassis painting; and each month from the sidewall gluing, fiberglass lay-up, headliner assembly, hood and door assembly, and the undercoating operation;
  - (4) The total VOC usage for each calendar day from the metal chassis painting; and monthly total VOC usage from the sidewall gluing, fiberglass lay-up, headliner assembly, hood and door assembly, and the undercoating operation.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

Dynamax Corporation  
P. O. Box 1647  
Elkhart, Indiana 46515

### Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_,  
(Title) (Company Name)

3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make

these representations on behalf of \_\_\_\_\_.  
(Company Name)

4. I hereby certify that Dynamax Corporation, 3733 Lexington Park Drive, Elkhart, Indiana, 46514, has constructed a motor home production plant, which involves the installation of the chassis, floor, sidewalls, roof, backwall, frontcap, window, cabinets, insulation, and carpet. This plant will utilize the following equipment:

(a) Six (6) natural gas-fired radiant heaters, R1 through R6, each has a heat input capacity of 0.06 million British thermal units per hour (mmBtu/hr),

(b) Four (4) natural gas-fired radiant heaters, R7 through R10, each has a heat input capacity of 0.08 mmBtu/hr,

(c) Four (4) natural gas-fired radiant heaters, R11 through R14, each has a heat input capacity of 0.1 mmBtu/hr,

(d) One (1) natural gas-fired radiant heater, R15 with a heat input capacity of 0.115 mmBtu/hr,

(e) Two (2) radiant heaters, R16 and R17, each has a heat input capacity of 0.4 mmBtu/hr,

(f) Welding operation; five (5) steel MIG welding stations, each is capable of using 8.8 pounds of wire per hour (lb/hr), one (1) aluminum welding station, which is capable of using 0.4 lb wire/hr, two (2) oxyacetylene flame cutters, with a total cutting rate of 28 inches per minute, and one (1) plasma cutter, with a cutting rate of 155 inches per minute

(g) Woodworking operation with a maximum throughput of 724 pounds of wood per hour, which consists of various woodworking equipment, and

(h) One (1) paint booth, PB-1, which is capable of painting 0.5 motor home per hour. This facility is equipped with air assisted airless guns. The particulate matter overspray will be controlled by dry filters, in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on August 21, 1997 and as permitted pursuant to

**Construction Permit No. CP-039-8896, Plant ID No. 039-00466** issued on \_\_\_\_\_.

5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)
  
6. I hereby certify that Dynamax Corporation now subject to the Title V program and will submit a Title V (or FESOP) operating permit application within twelve (12) months from the postmarked submission date of this Affidavit of Construction.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
 )SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.  
My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for New Construction and Operation

#### Source Background and Description

Source Name: Dynamax Corporation  
Source Location: 3733 Lexington Park Drive, Elkhart, Indiana 46514  
County: Elkhart  
Construction Permit No.: CP-039-8896-00466  
SIC Code: 3716  
Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Dynamax Corporation relating to the construction and operation of a motor home production plant, which involves the installation of the chassis, floor, sidewalls, roof, backwall, frontcap, window, cabinets, insulation, and carpet. This plant will utilize the following equipment:

- (a) Six (6) natural gas-fired radiant heaters, R1 through R6, each has a heat input capacity of 0.06 million British thermal units per hour (mmBtu/hr),
- (b) Four (4) natural gas-fired radiant heaters, R7 through R10, each has a heat input capacity of 0.08 mmBtu/hr,
- (c) Four (4) natural gas-fired radiant heaters, R11 through R14, each has a heat input capacity of 0.1 mmBtu/hr,
- (d) One (1) natural gas-fired radiant heater, R15 with a heat input capacity of 0.115 mmBtu/hr,
- (e) Two (2) radiant heaters, R16 and R17, each has a heat input capacity of 0.4 mmBtu/hr,
- (f) Welding operation; five (5) steel MIG welding stations, each is capable of using 8.8 pounds of wire per hour (lb/hr), one (1) aluminum welding station, which is capable of using 0.4 lb wire/hr, two (2) oxyacetylene flame cutters, with a total cutting rate of 28 inches per minute, and one (1) plasma cutter, with a cutting rate of 155 inches per minute
- (g) Wood working operation; which has a maximum throughput of 724 pounds of wood per hour and consists of one (1) table saw, one (1) radial arm saw, one (1) chop saw, one (1) band saw, one (1) skill saw, one (1) reciprocating saw, one Porter cable router, one (1) belt sander, one (1) D.A. sander, two (2) air drills, five (5) air screw guns, one (1) pin router, and miscellaneous hand tools. This operation is controlled by a Delta Dust Collector #50-180, and
- (h) One (1) paint booth, PB-1, which is capable of painting 0.5 motor home per hour. This facility is equipped with air assisted airless guns. The particulate matter overspray will be controlled by dry filters.

### Source Definition

Glaval Corporation consists of several plants. Plant 1 which is located at 55135 County Road # 1, Elkhart, Indiana, involves miscellaneous fiberglass and plastic parts painting such as running boards, high tops, etc. Plant 9 which is located at 914 County Road # 1, involves general assembly (running boards, high tops, windows, carpet installation, and others) for conversion vans. These two plants have an SIC code of 3710, and Dynamax Corporation has an SIC code of 3716. They are the closest plants to Dynamax Corporation. All these three plants are owned by the same person. As of this review a source determination is still being made if these two Glaval's plants and Dynamax Corporation are considered as one source. Even if the final determination is that these sources are considered one source, the level of approval for Dynamax Corporation in this application will not trigger PSD rule applicability. Therefore, this application can be reviewed independently.

### 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 August 21, 1997, with additional information received on October 6, 1997, and December 23, 1997.

### Emissions Calculations

- (1) Surface Coating: See page 1 of 3 TSD Appendix A for detailed calculations.
- (2) Hazardous Air Pollutants (HAPs) Emissions: See page 2 of 3 TSD Appendix A for detailed calculations.
- (3) Natural Gas Combustion: See page 3 of 3 TSD Appendix A for detailed calculations.
- (4) Welding:

Facility	No. of Stations	Emission Factor (Ef)	Emission (ton/yr)
Aluminum MIG Welding	1	0.0775 lb/lb	0.13 t/y PM
Steel MIG Welding	5	5.2 lb/1000 lb	1.0 t/y PM10
Total			1.13

Emission Factor (Ef) for the aluminum MIG welding was taken from the SARA 313 Reporting Guide. Steel MIG welding Ef, using SCC # 30-90-52-76 from the FIRE.

(5) Oxyacetylene Cutting:

There are two (2) stations. Emission factor, Ef using the "SARA 313 Reporting Guide"

$$\text{Throughput} = 1 \text{ station} * 28 \text{ in/min} * 0.625 \text{ in/in} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1/1000$$

$$= 18,396 \text{ Kin/yr}$$

$$\text{Throughput} = 1 \text{ station} * 155 \text{ in/min} * 0.125 \text{ in/in} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1/1000$$

$$= 10,183.5 \text{ Kin/yr}$$

Pollutant	Total Throughput (Kin/yr)	Emission Factor (lb/Kin)	Emissions (ton/yr)
PM <sub>10</sub>	28,579.5	0.1622	2.3
Mn	28,579.5	0.0005	0.01
Ni	28,579.5	0.0001	0.001
Cr	28,579.5	0.0003	0.004

Methodology:

$$\text{Emission} = \text{Throughput, kin/yr} * \text{lb/kin} * \text{ton}/2000 \text{ lb}$$

(6) Woodworking Operation:

Dust collected = 3.6 ton/yr, dust collector control efficiency = 99.5%

$$\text{PM} = (3.6 \text{ tons/yr}) (0.005)$$

$$= 0.18 \text{ ton/yr}$$

**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)	10.8	24.71
Particulate Matter (PM10)	3.3	3.3
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	98.3	98.3
Carbon Monoxide (CO)	0.2	0.2
Nitrogen Oxides (NO <sub>x</sub> )	0.9	0.9
Single Hazardous Air Pollutant (HAP)	17.2	17.2
Combination of HAPs	69.9	69.9

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

mandates a PM allowable emissions using the following equation:

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

Where:

E = PM allowable emissions in pounds per hour (lb/hr)  
P = Process weight rate in tons/hr

(aa) The painting operation will have an allowable PM emissions using the above equation.

(bb) Welding : P = 0.022 ton/hr

$$\begin{aligned} E &= 4.10 (0.022)^{0.67} \\ &= 0.32 \text{ lb/hr} \\ &= 1.4 \text{ ton/yr} \end{aligned}$$

(cc) Woodworking: P = 0.381 ton/hr

$$\begin{aligned} E &= 4.10 (0.381)^{0.67} \\ &= 2.14 \text{ lb/hr} \\ &= 9.4 \text{ ton/yr} \end{aligned}$$

- (b) The allowable PM emissions before control are less than the potential emissions, therefore, the allowable emissions before control are used for the permitting determination.
- (c) 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.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

### County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) 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 and NOx 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 other pollutants. 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**

Dynamax Corporation is a proposed plant. Existing Source PSD, Part 70 or FESOP Definition (Even Plant 1 and 9 of Glaval Corporation will be determined as part of Dynamax Corporation, existing total emissions from Glaval Corporation will not constitute a major source, either based on the "Airs Facility Subsystem Quick Look Report", dated July 24, 1997 or based on the permit issued to these plants):

Pollutant	Glaval Plants # 1 & # 9, based on CP 039-3822 issued on 12/12/95	Glaval Plants # 1 & # 9, based on the Airs Facility Subsystem Quick Look Report
PM	0.0	6.3
PM10	0.0	6.3
SO <sub>2</sub>	0.0	0.0
VOC	99.4	110.0
CO	0.0	0.0
NO <sub>x</sub>	0.0	0.0

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

**Proposed Modification**

PTE from Dynamax Corporation facilities (based on glue substitution in the sidewall gluing operation (EU-2), the plantwide VOC emissions are reduced by 30 tons per year):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	26.13	3.3	0.0	68.17	0.2	0.9
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. 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)

Dynamax Corporation is by itself a Title V source, based on their single HAP emissions of 10.6 tons per year. Glaval Corporation is also a Title V source and has submitted their Part 70 (T-039-6955-00126) application on October 18, 1996. Depending on the outcome of the source determination, the equipment being reviewed under this permit shall either be incorporated in the submitted Part 70 application of Glaval's or be incorporated in Dynamax Corporation Title V or FESOP application.

## Federal Rule Applicability

- (1) New Source Performance Standards  
There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this facility.
- (2) National Emissions Standards for Hazardous Air Pollutants (NESHAP)  
There are no NESHAPs, 40 CFR Part 63, applicable to this facility.

## State Rule Applicability

- (1) 326 IAC 2-6 (Emission Reporting)  
This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source, which is located in Elkhart County emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.
- (2) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)  
The seventeen (17) natural gas fired radiant heaters with a total rating of 1.88 mmBtu/hr are not subject 326 IAC 6-2 because they are not sources of indirect heating.
- (3) 326 IAC 6-3 (Process Weight: Allowable PM Emissions)  
This rule mandates a PM allowable emissions using the following equation:

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

Where: E = Allowable PM emissions in pounds per hour

P = Process weight rate in tons per hour

- (a) The painting operation will have an allowable PM emissions using the above equation. This facility is in compliance with this rule using dry filters to control the PM overspray emissions.

- (b) Welding : P = 0.022 ton/hr

$$\begin{aligned} E &= 4.10 (0.022)^{0.67} \\ &= 0.32 \text{ lb/hr} \\ &= 1.4 \text{ ton/yr} \end{aligned}$$

The source is in compliance with this rule, because this process is not vented into the atmosphere. The building acts as a control unit, which reduces the PM emissions from this operation.

- (c) Woodworking: P = 0.381 ton/hr

$$\begin{aligned} E &= 4.10 (0.381)^{0.67} \\ &= 2.14 \text{ lb/hr} \\ &= 9.4 \text{ ton/yr} \end{aligned}$$

This facility is in compliance with the rule, because its PM potential emissions of 0.18 tons/yr is less than the above allowable emissions.

- (4) 326 IAC 8-2-9: (Miscellaneous Metal Coatings)  
The metal chassis painting operation's VOC potential emissions based on 8760 hours per year is at 122.62 pounds per day, which is greater than 15 pounds per day. Based on the actual hours of operation, the actual VOC emissions are at 10.22 pounds per hour. Therefore, this operation will be limited to less than 15 pounds of VOC emissions per day in order for this operation to be exempted from the requirements of 326 IAC 8-2-9.
- (5) 326 IAC 8-1-6 (General Reduction Requirements)
- (1) The sidewall gluing operation, identified as EU-2 consists of gluing carpet, foam, and insulation to fiberglass floors, and sidewalls, has a potential VOC emissions of 98.3 tons per year. There are no other VOC rules in 326 IAC 8, applicable to this operation, therefore, 326 IAC 8-1-6 is applicable.
- The source submitted a Best Available Control Technology Analysis (BACT). The BACT determined for this operation is a material substitution. The original proposed glue to be used on this operation contains VOC and HAPs. The glue that was determined to be the BACT does not contain any VOC and HAPs. Therefore, a 30.09 tons per year reduction in the source's total VOC emissions will occur, or this new glue will result in no VOC and HAPs emissions.
- (2) The headliner gluing operation, identified as EU-3, consists of gluing fabric to wood, has a potential VOC emissions of 25.92 tons per year. There are no other VOC rules in 326 IAC 8, applicable to this operation, therefore, 326 IAC 8-1-6 is applicable. This operation however, is limited to 24 tons per year. Therefore, 326 IAC 8-1-6 is not applicable in this case.
- (6) 326 IAC 2-1-3.4 (New Source Air Toxics Control)  
The source is still major for single HAP (xylene) emissions at 10.6 tons per year and combination of HAPs emissions at 27.6 tons per year even after the HAPs emissions have been reduced due to the glue substitution in the sidewall gluing operation (EU-2). The single HAP emissions are limited to 9 tons per year to avoid this rule.

*Note: The source has chosen an averaging time based on a monthly rolling for their limitation reporting. Therefore, all the yearly limit to avoid the applicability of the above rules will be reduced by a month's emissions.*

## **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) Construction Permit Application Form Y.

- (a) Due to the glue substitution used on the sidewall gluing operation, as the BACT to satisfy the requirements of 326 IAC 8-1-6, and the emissions limit on a single HAP and any combination of HAPs to avoid 326 IAC 2-1-3.4 (New Source Air Toxics Control) this modification 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.

## **Conclusion**

The construction of this motor home production plant will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-8896-00466**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for New Construction and Operation

Source Name: Dynamax Corporation  
 Source Location: 3733 Lexington Park Drive, Elkhart, Indiana 46514  
 County: Elkhart  
 Construction Permit No.: CP-039-8896-00466  
 SIC Code: 3716  
 Permit Reviewer: Aida De Guzman

On January 15, 1998 the Office of Air Management (OAM) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Dynamax Corporation had applied for a construction permit to construct and operate a motor home production plant. 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.

A request for an extension of the timeclock on this application was made by the OAM, since there was a change in the material usage, which changed the data from the original application. The last information submitted by the applicant relevant to the change in the material usage was received by this office on March 9, 1998.

This change resulted in a decrease in VOC and HAPs emissions.

On February 13, 1998, Dynamax Corporation submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and strikeout for emphasis):

Comment 1: Section A.1 General Information, page 4 of 24 of the proposed permit, please change the production description to the following:

“The Permittee owns and operates a motor home production plant which involves the installation of the floor, sidewalls, roof, backwall, frontcap, windows, cabinets, insulation and carpet onto the chassis.

Response 1: Section A.1 General Information, page 4 of 24 of the proposed permit will be revised as follows:

The Permittee owns and operates a motor home production plant which involves the installation of the ~~chassis~~, floor, sidewalls, roof, backwall, frontcap, window, cabinets, insulation, and carpet **onto the chassis**.

Comment 2: (a) Section A.2 , page 4 of 24, there are two (2) oxyacetylene flame cutters each with a cutting rate of 28 inches per minute per station, not a total of 28 inches per minute per station.

(b) Also, please remove the welding equipment.

Response 2: Section A.2 page 4 of 16 will be revised to state there are two (2) oxyacetylene flame cutters each with a cutting rate of 28 inches per minute per station.

The emission calculation for these flame cutting stations will be revised as follows:

- (a) There are two (2) stations for the **oxyacetylene cutting and one (1) for plasma cutting**. Emission Factor, Ef using the "SARA 313 Reporting Guide"

$$\text{Throughput} = 2 \text{ station} * 28 \text{ in/min} * 0.625 \text{ in/in} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1/1000$$

$$= 18,396 \text{ Kin/yr}$$

$$\text{Throughput} = 1 \text{ station} * 155 \text{ in/min} * 0.125 \text{ in/in} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1/1000$$

$$= 10,183.5 \text{ Kin/yr}$$

Pollutant	Total Throughput (Kin/yr)	Emission Factor (lb/Kin)	Emissions (ton/yr)
PM <sub>10</sub>	28,579.5	0.1622	2.3
Mn	28,579.5	0.0005	0.01
Ni	28,579.5	0.0001	0.0
Cr	28,579.5	0.0003	0.0

Methodology:

$$\text{Emission} = \text{Throughput, kin/yr} * \text{lb/kin} * \text{ton}/2000 \text{ lb}$$

- (b) Welding Emissions:

Facility	No. of Stations	Emission Factor (Ef)	Emission (ton/yr)
Aluminum MIG Welding	1	0.0107 lb/lb	0.02 t/y PM
Steel MIG Welding	5	5.2 lb/1000 lb	1.0 t/y PM10
Total			1.02

- (c) The specific type of welding equipment will not be deleted in Section A.2 of the proposed permit, because the emission factors used in the emissions calculations were based on the specific type of welding used.

Comment 3: Please remove the individual list of equipment in the woodworking operation.

Response 3: The individual list of equipment will be deleted in the final permit, since the emission calculation was based on the maximum throughput of the operation and not by individual equipment. The wood working operation will be revised as follows:

Woodworking operation ~~which has with~~ a maximum throughput of 724 pounds of wood per hour, ~~and which~~ consists of ~~one (1) table saw, one (1) radial arm saw, one (1) chop saw, one (1) band saw, one (1) skill saw, one (1) reciprocating saw, one Porter cable router, one (1) belt sander, one (1) D.A. sander, two (2) air drills, five (5) air screw guns, one (1) pin router, and miscellaneous hand tools. This operation is controlled by a Delta Dust Collector, identified as DC-1, various woodworking equipment.~~

Comment 4: The source is replacing the Centari solvent based chassis paint to Black Water Reducible DTM paint. The Benders spray adhesive #618, #601 and # 630 for the gluing will be replaced by Hot Melt Adhesive. Due to the replacement of the paints the source is no longer subject to the Part 70 Permit. This material substitution will result in a decrease in emissions as compared to the original materials in the application.

Response 4: Based on the new material substitution, the emission calculations will be revised. See attached new spreadsheets pages 1 and 2 TSD Addendum Appendix A. A re-evaluation will be made to determine all the rules that are applicable to the source. Some of the source's comments that were not addressed or given a response in this Addendum are irrelevant because the change in the material, which lowered the VOC and HAPs emissions, will trigger a new rule applicability. Section D of the proposed permit will be revised based on the new rule determination. See below determination:

Summary of Emissions

Pollutant	Surface Coating		Natural Gas Combustion		Welding		Oxyacetylene Cutting		Woodworking		Total Uncontrolled Emissions	Total Controlled Emissions
	Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled		
PM	3.0	0.3	0.1	0.1	1.02	1.02	0.0	0.0	3.6	3.6	7.72	5.02
PM10	3.0	0.3	0.1	0.1	1.02	1.02	2.3	2.3	3.6	3.6	10.02	7.32
VOC	39.07	39.07	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	39.07	39.07
SO2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CO	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2
NOx	0.0	0.0	0.9	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.9
Single HAP	7.24	7.24	0.0	0.0	0.0	0.0	0.01	0.01	0.0	0.0	7.25	7.25
Combined HAPs	22.9	22.9	0.0	0.0	0.0	0.0	0.015	0.015	0.0	0.0	22.91	22.91

**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)	<del>40.8</del> <b>33.4</b>	<del>24.74</del> <b>7.72</b>
Particulate Matter (PM10)	<del>3.3</del> <b>28.2</b>	<del>3.3</del> <b>10.02</b>
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	<del>98.3</del> <b>39.07</b>	<del>98.3</del> <b>39.07</b>
Carbon Monoxide (CO)	0.2	0.2
Nitrogen Oxides (NO <sub>x</sub> )	0.9	0.9
Single Hazardous Air Pollutant (HAP)	<del>47.2</del> <b>7.25</b>	<del>47.2</del> <b>7.25</b>
Combination of HAPs	<del>69.9</del> <b>22.91</b>	<del>69.9</del> <b>22.91</b>

- (b) The ~~allowable~~ **potential** PM emissions before control are less than the ~~potential~~ **allowable** emissions, therefore, the ~~allowable~~ **potential** emissions before control for these operations are used for the permitting determination.
- (d) ~~Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required~~

**Source Definition:**

~~Glaval Corporation consists of several plants. Plant 1 which is located at 55135 County Road # 1, Elkhart, Indiana, involves miscellaneous fiberglass and plastic parts painting such as running boards, high tops, etc. Plant 9 which is located at 914 County Road # 1, involves general assembly (running boards, high tops, windows, carpet installation, and others) for conversion vans. These two plants have an SIC code of 3710, and Dynamax Corporation has an SIC code of 3716. They are the closest plants to Dynamax Corporation. All these three plants are owned by the same person. As of this review a source determination is still being made if these two Glaval's plants and Dynamax Corporation are considered as one source. Even if the final determination is that these sources are considered one source, the level of approval for Dynamax Corporation in this application will not trigger PSD rule applicability. Therefore, this application can be reviewed independently.~~

**Dynamax Corporation, which is a motor home production plant is considered a part of Glaval Corporation because of the following reasons:**

- about (a) **Glaval Plant 1, which is located at 55135 County Road # 1, Elkhart, Indiana is one-fourth (1/4) mile away from Dynamax Corporation, with the same two-digit SIC code and owned by the same person. The miscellaneous fiberglass and plastic parts such as running boards, high tops, etc. produced at this plant is shipped to Plant 9, which involves general assembly (running boards, high tops, windows, carpet installation, and others) for conversion vans.**
- (b) **Glaval Plant 9, which is located in 914 County Road #1, Elkhart, Indiana, is also about one-fourth (1/4) mile away from Dynamax Corporation, with the same two-digit SIC code and owned by the same person.**

**Since Glaval plants and Dynamax are located in an adjacent properties, have the same SIC codes and owned by one company, they will be considered as one (1) source. The OAM, has verified from the source that there are existing residences and some properties in between Glaval plants and Dynamax Corporation.**

**Source Status**

~~Dynamax Corporation is a proposed plant. Existing Source PSD, Part 70 or FESOP Definition (Even Plant 1 and 9 of Glaval Corporation will be determined as part of Dynamax Corporation, existing total emissions from Glaval Corporation will not constitute a major source, either based on the "Airs Facility Subsystem Quick Look Report", dated July 24, 1997 or based on the permit issued to these plants):~~

Existing Source PSD Definition **(Existing total emissions from Glaval Corporation will not constitute a PSD major source, either based on the "Airs Facility Subsystem Quick Look Report", dated July 24, 1997 or based on the permit issued to these plants):**

**Proposed Modification**

PTE from Dynamax Corporation facilities (based on ~~the~~ **the materials** substitution in the sidewall gluing operation (EU-2), **and the chassis painting operation, at 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):**

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	<del>26.13</del> <b>5.02</b>	<del>3.3</del> <b>7.32</b>	0.0	<del>68.17</del> <b>39.07</b>	0.2	0.9
PSD or Offset Threshold Level	250	250	250	250	250	250

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

~~Dynamax Corporation is by itself a Title V source, based on their single HAP emissions of 10.6 tons per year. Glaval Corporation, is also has submitted a Title V application (T-039-6955-00126), on October 18, 1996. Depending on the outcome of the source determination, the equipment being reviewed under this permit shall either be incorporated in the submitted Part 70 application of Glaval's or be incorporated in Dynamax Corporation Title V or FESOP application~~  
**Information in this application will be incorporated in Glaval's Title V application.**

**State Rule Applicability**

- (4) 326 IAC 8-2-9: (Miscellaneous Metal Coatings)
  - (a) The metal chassis painting operation is not subject to this rule, because its VOC potential emissions based on 8760 hours per year at ~~122.62~~ **8.04** pounds per day, which is ~~greater~~ below 15 pounds per day. Based on the actual hours of operation, the actual VOC emissions ~~are at 10.22 pounds per day~~ **will even be a lot lower.** Therefore, this operation will be limited to ~~less than 15 pounds of VOC emissions per day in order for this operation~~ exempted from the requirements of 326 IAC 8-2-9.

- (5) 326 IAC 8-1-6 (General Reduction Requirements)
- (a) The sidewall gluing operation, identified as EU-2 consists of gluing carpet, foam, and insulation to fiberglass floors, and sidewalls, ~~has a potential VOC emissions of 98.3 tons per year. There are no other VOC rules in 326 IAC 8, applicable to this operation, therefore, 326 IAC 8-1-6 is applicable.~~ The material used from this operation has been changed in order to be exempted from 326 IAC 8-1-6. **The potential VOC emissions from this operation are 6.1 tons per year.**
- ~~The source submitted a Best Available Control Technology Analysis (BACT). The BACT determined for this operation is a material substitution. The original proposed glue to be used on this operation contains VOC and HAPs. The glue that was determined to be the BACT does not contain any VOC and HAPs. Therefore, a 30.09 tons per year reduction in the source's total VOC emissions will occur, or this new glue will result in no VOC and HAPs emissions.~~
- (b) **The fiberglass lay-up operation is not subject to 326 IAC 8-1-6, because its potential VOC emissions of 3.36 tons per year are below 25 tons per year.**
- (c) **The undercoating operation, which applies rubberized coating to make the foam that surrounds the chassis skirt watertight, is not subject to 326 IAC 8-1-6 because its potential VOC emissions of 4.78 tons per year, is below 25 tons per year.**
- (d) **The hood and door adhesive coating operations, which apply paint to the door and hood fiberglass shell is not subject to 326 IAC 8-1-6 because the VOC potential emissions from these operations at 13.58 tons per year are below 25 tons per year.**
- (e) ~~The headliner gluing operation, identified as EU-3, consists of gluing fabric to wood, has a potential VOC emissions of 25.92 tons per year. There are no other VOC rules in 326 IAC 8, applicable to this operation, therefore, 326 IAC 8-1-6 is applicable. This operation however, is limited to 24 tons per year. Therefore, 326 IAC 8-1-6 is not applicable in this case.~~ **The headliner assembly is not subject to 326 IAC 8-1-6, because its potential VOC emissions of 6 tons per year are below 25 tons per year.**
- (6) 326 IAC 8-2-12 (Surface Coating Limitations: Wood Furniture and cabinet coating)
- (a) **The wood trim coating operation's potential VOC emissions at 8760 hours per year are at 5.7 pounds per day, which are below 15 pounds of actual VOC emissions per day. Therefore, this operation will be exempted from 326 IAC 8-2-12.**
- (b) **However, the source requested that the wood trim coating operation should be subject to this rule, and should comply with 326 IAC 8-2-12 using the method of applications mentioned in the rule.**
- (c) **The wood trim coating operation is in compliance with this rule using aerosol can spray, which is one of the methods in the rule.**
- (7) 326 IAC 2-1-3.4 (New Source Air Toxics Control)
- ~~The source is still major for single HAP (xylene) emissions at 10.6 tons per year and combination of HAPs emissions at 27.6 tons per year even after the HAPs emissions have been reduced due to the glue substitution in the sidewall gluing operation (EU-2). The single HAP emissions are limited to 9 tons per year to avoid this rule.~~

~~Note: The source has chosen an averaging time based on a monthly rolling for their limitation reporting. Therefore, all the yearly limit to avoid the applicability of the above rules will be reduced by a month's emissions.~~

Dynamax Corporation is not subject to this rule, because it is not major for HAPs emissions.

## Air Toxic Emissions

~~(a) Due to the glue substitution used on the sidewall gluing operation, as the BACT to satisfy the requirements of 326 IAC 8-1-6, and the emissions limit on a single HAP and any combination of HAPs to avoid 326 IAC 2-1-3.4 (New Source Air Toxics Control) this modification 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.~~

**(a) This modification 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, due to the glue substitution used on the sidewall gluing and undercoating operations.**

Comment 5: Section C.16(c)(4), page 13 of 24 of the proposed permit should be deleted. This is not required by law and overly burdensome.

Response 5: Preventive Maintenance Plan is required for this source. (See response 8).

Comment 6: Section D.1.7(a) and (b) refer to a "Compliance Response Plan". The proposed construction permit does not require a Compliance Response Plan.

Response 6: The source is a Title V source, since it is considered as a part of Glaval. Title V sources are required to submit a Compliance Monitoring Plan which contain a Compliance Response Plan (CRP) for each compliance monitoring condition of the permit. This requirement will be applicable to Dynamax once it is incorporated in Glaval's Part 70 permit application. Therefore, no changes have been made in the condition.

Comment 7: Section D.1.9(a) Recordkeeping Requirements  
Please remove all references to D.1.3 since the sidewall gluing operation using hot melt glue has no VOC and HAPs emissions.

Response 7: Although, the hot melt glue has no VOC and HAPs, Sikoflex have VOC and HAPs emissions. The worse coating is to be considered when doing the VOC and HAPs emissions calculations. Therefore, Section D.1.9(a) Recordkeeping Requirements will not be revised.

Comment 8: Section C.16(c)(4) General Record Keeping Requirements  
Please delete the following statement "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". This is not required by law and would be burdensome.

Response 8: Pursuant to 326 IAC 1-6-3, any person responsible for operating any facility specified in 326 IAC 1-6-1 (facilities required to obtain a permit under 326 IAC 2-1-2 and 326 IAC 2-1-4) shall prepare and maintain a Preventive Maintenance Plan.

The above statement in your comment is mainly detailing or expanding on what is required in a PMP.

Based on the new information relevant to the new coatings the Section D of the proposed permit, will be revised as follows (changes are bolded for emphasis):

## Emissions Limitation and Standards

### D.1.1 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9]

- ~~(1) The metal chassis painting operation's VOC actual emissions shall be limited to 14 pounds per day. Compliance with this limit will make 326 IAC 8-2-9 (Miscellaneous Metal Coatings) not applicable.~~
- ~~(2) Any change or modification which may increase the VOC actual emissions to 15 pounds per day or more before add-on controls from the metal chassis painting shall require prior approval.~~

### D.1.2 ~~BACT Minor Limitation~~ Volatile Organic Compounds (General Reduction Requirements) [326 IAC 8-1-6]

- ~~(a) The input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the headliner gluing operation, ID EU-3, shall be limited to 22 tons per year, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.~~
- ~~(b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.~~

**Any change or modification which may increase each facility VOC potential emissions to 25 tons per year or more from the side wall gluing, fiberglass lay-up, undercoating operation, hood and door adhesive coating operation, and the headliner assembly shall require prior approval and be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).**

### D.1.3 ~~BACT Determination~~ Volatile Organic Compounds (Surface Coating Limitation: Wood Furniture and Cabinet Coating) [326 IAC 8-2-12]

~~Pursuant to the requirements of 326 IAC 8-1-6, the BACT determined for the sidewall gluing operation, ID EU-2, shall be a material substitution; from glue with a maximum VOC content by weight of 88 % (percent) and a maximum HAP content by weight of 65% to a glue with no VOC and HAP content. Therefore, this material substitution will result in a zero VOC and HAP emissions from this facility.~~

**Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to the wood trims shall utilize one or more of the following application methods:**

<b>Airless Spray Application</b>	<b>Air-Assisted Airless Spray Application</b>
<b>Electrostatic Spray Application</b>	<b>Electrostatic Bell or Disc Application</b>
<b>Heated Airless Spray Application</b>	<b>Roller Coating</b>
<b>Brush or Wipe Application</b>	<b>Dip-and-Drain Application</b>
<b>High Volume Low Pressure HVLP</b>	<b>Aerosol Spray Cans</b>

**High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates**

**between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.**

**D.1.4 PM process operation (326 IAC 6-3):**

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

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

Where: E = PM allowable emissions in pounds hour  
 P = Process weight rate in tons per hour

Facility/Operation	Process Weight Rate (ton/hr)	PM Allowable Emissions (lb/hr)
Woodworking	0.381	2.14
Welding	0.022	0.32
Paint Booth, PB-1	<b>PM Allowable Emissions to be determined using the above equation</b>	

**Compliance Monitoring Requirements**

*Preventive Maintenance Plan has been added in the final permit and numbered as D.1.5 which states as follows. All subsequent condition have been renumbered accordingly:*

**D.1.5. Preventive Maintenance Plan**

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

*The following Section D.1.5 in the proposed permit has been renumbered to D.1.6 in the final permit.:*

**D.1.6 Volatile Organic Compounds**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 through D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, 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.1.6~~ **D.1.7 Particulate Matter (PM)**

The dry filters for particulate matter overspray control shall at all times be in placed when paint booth, PB-1 is in operation.

~~D.1.8~~ **Dust Collector Operating Condition**

~~That the dust collector, DG-1 shall be operated at all times when the woodworking operation is in operation:~~

- ~~(c) The Permittee shall take readings of the total static pressure drop across the dust collector, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop from the dust collector shall be maintained at 4.6 inches of water. The~~

~~Preventive Maintenance Plan for the dust collector shall contain troubleshooting contingency and corrective actions for the dust collector when the pressure reading is outside of this range for any one reading.~~

- ~~(b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~
- ~~(c) The gauge employed to take the pressure drop across the dust collector or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2\%$  of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.~~
- ~~(d) An inspection shall be performed each calendar quarter of the all the dust. Defective dust collector shall be replaced. A record shall be kept of the results of the inspection and the number of dust collector replaced.~~
- ~~(a) In the event that a dust collector's failure has been observed:
  - ~~(i) The affected compartments will be shut down immediately until the failed units have been replaced.~~
  - ~~(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.~~~~

*The woodworking operation emits insignificant amount of PM, even before the dust collector. The source proposed to remove this control equipment. The above condition D.1.8 in the proposed permit has been deleted in the final permit, since it does not apply anymore.*

## Record Keeping and Reporting Requirements

### D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, ~~through and D.1.2~~ the Permittee shall maintain **records in accordance with (1) through (4) below. Records maintained for (1) through (4)** shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Conditions D.1.1, ~~through and D.1.2.~~
  - (1) The amount of VOC and HAP 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 volume weighted VOC content of the coatings used for each calendar day;~~
  - (3) The cleanup solvent usage for each **day from the chassis painting and each month from the sidewall gluing, fiberglass lay-up, headliner assembly, hood and door assembly, and the undercoating operation;** and

- (4) The total VOC usage for each calendar day **from the metal chassis painting; and monthly total VOC usage from the sidewall gluing, fiberglass lay-up, headliner assembly, hood and door assembly, and the undercoating operation.**

*The following Section D.1.10 Reporting Requirements of the proposed permit has been deleted in the final permit, since the source emissions are not limited in any way. All the reporting forms required in the proposed permit were all deleted in the final permit.*

#### ~~D.1.10 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1, D.1.2 and C.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

Upon further review, OAM has made the following changes (changes are bolded for emphasis).

### SECTION C

- (1) Operation condition C.3 originally proposed as follows:

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**C.3 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.

~~This condition is not federally enforceable.~~

To as follows: (C.3 in the proposed permit has been renumbered to C.2 in the final permit.)

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**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

- (2) Operation condition C.4 (Open Burning) originally proposed as follows:

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**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. ~~This condition is not federally enforceable.~~

To as follows: (C.4 in the proposed permit has been renumbered to C.3 in the final permit)

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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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.**

(3) Operation condition C.5 (Incineration) originally proposed as follows:

**C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]**

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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. This condition is not federally enforceable.

To as follows:(C.5 in the proposed permit has been renumbered to C.4 in the final permit)

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]**

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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.

(4) Operation condition C.6 originally proposed as follows:

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

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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) regarding visible dust is not federally enforceable.~~

To as follows:(C.6 in the proposed permit has been renumbered to C.5 in the final permit)

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). **326 IAC 6-4-2(4) is not federally enforceable.**