

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

**Skyline Corporation (Formerly Nomad / Layton - Elkhart)
401 County Road 15 South
Elkhart, Indiana 46515**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-9115-00306	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle (RV) manufacturing plant.

Responsible Official: Skyline Corporation (Formerly Nomad / Layton - Elkhart)
Source Address: 401 County Road 15 South, Elkhart, Indiana 46515
Mailing Address: P. O. Box 743, Elkhart, Indiana 46515-0743
SIC Code: 3792
County Location: Elkhart
County Status: Maintenance for Ozone and Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program and ENSR
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Thirty nine (39) stationary and hand-held wood cutting saws rated at a maximum throughput of 132,188 pounds per hour, particulate matter controlled by a cyclone separator and exhausting to stack identified as C-3 in plant 2;
- (b) Various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2 with a maximum capacity of manufacturing three (3) recreational vehicles per hour, with no control for overspray. This assembly area was constructed prior to 1980.

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

This Stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

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

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

- (a) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:

- (1) The applicable requirements are included and specifically identified in this permit;
 - (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.
- (b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

- (a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.

- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

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

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.24 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.25 Construction Permit Requirement [326 IAC 2]

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

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.29 Enhanced New Source Review [326 IAC 2]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

- (a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.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]

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 [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is 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 non friable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days before the intended test date.

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Monitoring Methods [326 IAC 3]

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]

- (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.

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

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6][326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
 - (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location 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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any **quarterly** report shall be submitted within thirty (30) days of the end of the reporting period.
 - (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
 - (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

Thirty nine (39) stationary and hand-held wood cutting saws rated at a maximum throughput of 132,188 pounds per hour, particulate matter controlled by a cyclone separator and exhausting to stack identified as C-3 in plant 2;

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 47.20 pounds per hour when operating at a process weight rate of 132,188 pounds per hour.

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

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

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

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

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

Compliance Determination Requirements

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.4 Particulate Matter (PM)

The cyclone separator identified as C-3 for PM control shall be in operation at all times when the wood working saws are in operation and exhausting to the outside atmosphere.

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the wood working saws stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the cyclone separator stack exhaust.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY CONDITIONS

Various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2 with a maximum capacity of manufacturing three (3) recreational vehicles per hour, with no control for overspray.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the recreational vehicles manufacturing process in plant 1 and 2 shall not exceed 21.70 pounds per hour emission rate established as E in the following formula:

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

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

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal parts of the recreational vehicles shall be limited to 3.5 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

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

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if the OAM requests, compliance with the volatile organic compounds (VOC) limit specified in Condition D.2.2 (a) shall be determined by a performance tests conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.6 Volatile Organic Compounds (VOC)

(a) The daily volume weighted VOC content and usage limitations contained in Condition D.2.2(a) of the coatings used for each day shall be determined by using the following equation:

$$\text{lb VOC /gal less water} = 3 \text{ coats } \left\{ \text{density, lb./gal} * \text{wt. \% organics} * \text{gal of mat. Gal/unit} \right\} / \left\{ (1 - \% \text{ vol. water}) * \frac{\text{density coat, lb./gal}}{\text{density water, lb./gal}} \right\}$$

{ 3coats, gal unit}

(b) IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Monitoring

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

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.2(a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2(a).

(1) The amount and VOC content of each coating material and solvent applied to metal parts of the recreational vehicles (RV). 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 day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

- (6) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Skyline Corporation (Formerly Nomad / Layton - Elkhart)
Source Address: 401 County Road 15 South, Elkhart, Indiana 46515
Mailing Address: P.O. Box 743, Elkhart, Indiana 46515
Part 70 Permit No.: T039-9115-00306

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Skyline Corporation (Formerly Nomad / Layton - Elkhart)
Source Address: 401 County Road 15 South, Elkhart, Indiana 46515
Mailing Address: P.O. Box 743, Elkhart, Indiana 46515
Part 70 Permit No.: T039-9115-00306

This form consists of 2 pages

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Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

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

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Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Skyline Corporation (Formerly Nomad / Layton - Elkhart)
Source Location: 401 County Road 15 South, Elkhart, Indiana 46515
County: Elkhart
SIC Code: 3792
Operation Permit No.: T 039-9115-00306
Permit Reviewer: Manoj P. Patel

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Skyline Corporation relating to a recreational vehicle (RV) manufacturing plant operation.

Source Definition

This recreational vehicle manufacturing company consists of two (2) plants:

Plant 1 and 2 are located at 401 County Road 15 South, Elkhart, Indiana 46515.

Since the two (2) plants are located at the same properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Thirty nine (39) stationary and hand-held wood cutting saws rated at a maximum throughput of 132,188 pounds per hour, particulate matter controlled by a cyclone separator and exhausting to stack identified as 3 in plant 2;

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- (1) Various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2 with a maximum capacity of manufacturing three (3) recreational vehicles per hour, with no control for overspray. This assembly area was constructed prior to 1980.

This operation is permitted under existing registration issued to the source on September 5, 1997. It is being reviewed again under Enhanced New Source Review (ENSR) because the source is changing their coatings, which will emit volatile organic compounds and hazardous air pollutants (HAP) above the registration level.

Insignificant Activities

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Forty (40) natural gas fired space heaters, each rated at 0.30 million British thermal units per hour (MMBtu/hr), exhausting to stack identified as A-C of service building, E - K and M -W of plant 1 and 1, 2,6-11, 15 -18 and 21-27 of plant 2;
- (2) Equipment powered by internal combustion engines of capacity equal to less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour
- (3) Combustion source flame safety purging on startup
- (4) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- (4) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (b) having a vapor pressure equal to or less than 0.70 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (5) Structural and bridge fabrication activities using 80 tons or less of welding consumables.
- (6) Water based adhesives that are less than or equal to 5% by volume of VOC excluding HAPs.
- (7) Paved and unpaved roads and parking lots with public access.
- (8) On-site fire and emergency training approved by the department.

Existing Approvals

The source has been operating under previous approvals:

- (1) R 039-4343-00306, issued on September 5, 1995.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on October 22, 1997. Additional information was received on December 16, 1997.

Emission Calculations

(1) RV Manufacturing Operation (Equipment under ENSR):

See Appendix A of TSD for the volatile organic compounds (VOC) and particulate matter emissions from the recreational vehicles manufacturing operation at plant 1 & 2.

See Appendix B of TSD for the Hazardous Air Pollutants (HAPs) emissions from the recreational vehicles manufacturing operation in at plant 1 & 2.

(2) Wood Cutting Saws Operation (Equipment under Part 70):

As per the information provided in the construction permit application, this facility remains unchanged from CP # 039-4343 as amended by A # 039-4583, except that cyclone D in plant 1 has been disconnected and the wood cutting machinery moved to plant 2 and exhausting through cyclone 3.

The particulate matter emissions from the saw dust collection process operations are controlled by a cyclone dust collector, exhausting to stack 3. For the purpose of the PM calculation, data submitted in the construction permit application submitted in 1995 was used.

Amount of Sawdust Collected from the cyclone E = $E_c = 3.36$ tons/year. The dust collected was based on the 2000 actual hours of the facility operation.

$$\begin{aligned} \text{Sawdust based on the 8,760 hours of operation} &= 8,760 \times (3.36 / 2,000) \\ &= 14.72 \text{ tons/year} \end{aligned}$$

$$\text{Cyclone Efficiency} = n = 80\%$$

$$\text{Amount of Sawdust at the inlet} = E_i$$

$$\text{Amount of Sawdust at the outlet} = E_o$$

Potential Particulate Matter (PM) emissions (E_o):

$$\text{Wood Dust at the inlet of the Cyclone (} E_i \text{)} = \text{Total Wood Dust Collected (} E_c \text{)} + \text{Total Saw Dust emitted (} E_o \text{)}$$

$$\begin{aligned} E_o &= E_c (1/n-1) \\ &= 14.72 (1/0.8-1) \\ &= 3.68 \text{ tons/year} \end{aligned}$$

$$\begin{aligned} \text{Uncontrolled PM emissions (} E_i \text{)} &= E_o + E_c \\ &= (3.68 + 14.72) \text{ tons/year} \\ &= 18.40 \text{ tons/year} \end{aligned}$$

$$\text{Controlled PM emissions} = 3.70 \text{ tons/year}$$

Summary of emissions:

		PM / PM ₁₀	VOC	NO _x	SO ₂	CO	Toluene	Total HAPs
Permitted Equipment (Part 70)	Wood cutting saws	18.40	0.0	0.0	0.0	0.0	0.0	0.0
Equipment under ENSR	Recreational Vehicles (RV) Manufacturing	0.70	93.90	0.0	0.0	0.0	40.0	59.50
Total Uncontrolled Emissions (tons/year)		19.10	93.90	0.0	0.0	0.0	40.0	59.50
Total Controlled Emissions (tons/year)		4.40	93.90	0.0	0.0	0.0	40.0	59.50

Total Potential and Allowable Emissions (for the ENSR)

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)	95.0	0.70
Particulate Matter (PM10)	95.0	0.70
Sulfur Dioxide (SO ₂)	0.0	0.0
Volatile Organic Compounds (VOC)	93.90	93.90
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO _x)	0.0	0.0
Single Hazardous Air Pollutant (HAP) - Toluene	40.0	40.0
Combination of HAPs	59.50	59.50

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

(1) RV Manufacturing: (P= 12.0 ton/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (12.0)^{0.67} \\
 &= 21.70 \text{ lb/hr} \\
 &= 95.0 \text{ ton/yr}
 \end{aligned}$$

Where:

$$\begin{aligned}
 E &= \text{Allowable PM emissions, lb/hr} \\
 P &= \text{Process Weight rate, ton/hr} \\
 &= 12.0 \text{ ton/hr}
 \end{aligned}$$

- (b) The potential emissions after control are less than the allowable emissions, therefore, the potential emissions after 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 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.

Potential Emissions (For Part 70)

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

Pollutant	Potential Emissions (tons/year)
PM	19.70
PM-10	19.70
SO ₂	0.0
VOC	93.90
CO	0.0
NO _x	0.0

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

HAP's	Potential Emissions (tons/year)
Toluene	40.0
Hexane	10.50
MEK	7.20
Xylene	0.80
Other HAPs	1.0
TOTAL	59.50

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

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	Attainment or Unclassifiable
PM-10	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
Ozone	Attainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) 40 CFR Part 60 applicable to this source.
- (b) The recreational vehicle manufacturing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Operations), because this source is not engaged in manufacturing of any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particle board, and wood furniture components such as drawer sides, cabinet doors, seat cushions, laminated tops.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Visible Emissions Limitations)

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

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

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

State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the recreational vehicle manufacturing plant shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the recreational vehicle manufacturing plant is in compliance with this requirement.

326 IAC 8-1-2 (General Provisions Relating to VOC Rules)

Pursuant to 326 IAC 8-1-2 (a) (7)(General Provision Relating to VOC Rules), a daily volume - weighted average of gallons solids coating and VOC content of each coating shall be maintained and made available upon request. The records of daily emissions in pounds VOC shall be maintained and made available upon request.

$$\text{lb VOC /gal less water} = 3 \text{ coats } \left\{ \frac{\text{density, lb./gal} * \text{wt. \% organics} * \text{gal of mat. Gal/unit}}{\{(1- \% \text{ vol. water}) * \text{density coat, lb./gal}\}} \right\}$$

{ 3coats, gal unit}

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the recreational vehicle manufacturing operation shall be limited to 21.70 pounds per hour using the following equation:

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

$$\begin{aligned} E &= 4.10 P^{0.67} & \text{where } E &= \text{rate of emission in pounds per hour and} \\ &= 4.10 (12.0)^{0.67} & P &= \text{process weight rate in tons per hour} \\ &= 21.70 \text{ lbs./hr} \end{aligned}$$

- (b) The particulate matter (PM) from the wood cutting saws operation shall be limited to 47.20 pounds per hour by using the following equation:

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

$$\begin{aligned} E &= 55.0 P^{0.11} - 40 & \text{where } E &= \text{rate of emission in pounds per hour;} \\ &= 55.0 (66.10)^{0.11} - 40 & P &= \text{process weight rate in tons per hour} \\ &= 47.20 \text{ lbs./hr} \end{aligned}$$

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

Pursuant to 326 8-2-12 (Wood Furniture and Cabinet Coating), The permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for the touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system. A stain is applied by a hand wipe application to the closet cabinets to dress up the cut edge, it complies with this rule.

326 IAC 2-1-3.4 (New Source Toxic Control)

326 IAC 2-1-3.4 (New Source Toxic Control) does not apply to various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2, because this is an existing facility and the modification is for the formulation of coatings only. Since, it is not a new facility, this rule does not applicable.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to wood working saws are as follows:

1. The wood cutting saws operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the cyclone separator stack identified as C-3 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: Skyline Corporation (Formerly Nomad / Layton - Elkhart)
Source Location: 401 County Road 15 South, Elkhart, Indiana 46515
County: Elkhart
SIC Code: 3792
Operation Permit No.: T039-9115-00306
Permit Reviewer: Manoj P. Patel

On January 2, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Skyline Corporation (Formerly Nomad / Layton - Elkhart) had applied for a Part 70 Operating Permit to operate a stationary recreational vehicle (RV) manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Skyline elected to have IDEM issue the new source review (NSR) permit separately from the Part 70 permit due to the constraints of the permitting rules' time limits. Skyline has originally submitted their construction permit application and converted into the Part 70 permit application on October 16, 1997. Skyline Corporation has been issued a separate construction permit (CP # 039-9516-00306) on March 3, 1998.

On January 22, 1998, Mr. David L. Whitmer of Derolf Environmental Consulting Agency, Inc. on behalf of the Skyline Corporation submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Please include all the insignificant activities claimed in form GSD-10a of the application.

Response to Comment 1:

Insignificant activities listed in Section A.3 of the permit are only those that are specifically regulated by state or federal rules. The TSD has a complete list of insignificant activities at the source. Those that were listed in the TSD and not in the permit, do not have specific rules that apply to them. There have been no changes resulting from this comment.

Comment 2:

Condition C.7 (Asbestos Abatement Projects) and C.12 (Asbestos Abatement Projects) , page 19 and 20 of 33 in the draft Part 70 permit should be removed. This source does not contain any asbestos of any description, and therefore is not subject to this requirement.

Response to Comment 2:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector. The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

Demolition is defined as removing supporting beams, walls or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. There have been no changes resulting from this comment.

Comment 3:

Condition C.9 Performance Testing, page 19 of 33 in the draft Part 70 permit should be removed. There are no requirements for testing applicable to this source. Condition C.15 Actions Related to Noncompliance Demonstrated by a Stack Test, page 22 of 33 in the draft Part 70 permit should be removed.

Response to Comment 3:

In the Condition D.2.5 (a), OAM clearly stated that OAM reserves the authority to determine compliance using the Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. In that case, testing must be conducted in accordance with 326 IAC 3-2.1 (source sampling Procedures). Therefore, Condition C.9 and C.15 remain unchanged and a new section D.2.4 (Testing Requirements) has been added. No testing is being required of this source at this time; this is specifically added in the final permit in Condition D.2.4 under Compliance Determination requirements. Condition D.2.5 (Testing requirements) for the Page 31 of 35 in the final permit is clarified as follows:

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if the OAM requests, compliance with the volatile organic compounds (VOC) limit specified in Condition D.2.2 (a) shall be determined by a performance tests conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Comment 4:

Condition C.10 (Maintenance of Monitoring Equipment), page 20 of 33 in the draft Part 70 permit should be removed. There is no monitoring equipment required by this permit.

Response to Comment 4:

There is no monitoring equipment located at the source. Therefore, proposed Condition C.10 (Maintenance of Monitoring Equipment) is not applicable and has been removed. Subsequent conditions have been renumbered accordingly.

Comment 5:

Condition C.13 Risk Management Plan, Page 21 of 33 in the draft Part 70 permit should be removed. Skyline does not have any regulated substances in quantities in excess of the threshold quantities and therefore is not required to comply with C.13(a) and (b) until such time it does have such material in such quantities on this property.

Response to Comment 5:

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The provision may be applicable if the Permittee does meet the threshold at a some time in future. The condition remains in the permit.

Comment 6:

Condition C.16(b) (renumbered as C.15) Emission Statement, Page 23 of 33 in the draft Part 70 Permit should be change to read as follows:

"The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31 of that year."

Response to Comment 6:

Pursuant to 326 IAC 2-6-3 (Emission Reporting), the owner or operator of any facility falling within the applicability guidelines set forth in section 1 of the 326 IAC 2-6 rule must annually submit an emission statement to the commissioner. This submittal must be received by the department each year by April 15 for those sources covered by section 1(a) of 326 IAC 2-6. There will be no change due to this comment.

Comment 7:

Condition C.18 (a) (renumbered as C.17) General Record Keeping Requirements, Page 24 of 33 in the draft Part 70 permit should be rewritten to read as:

"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 the monitoring sample, measurement, report, or application."

It is unlikely that any organization (including OAM) could produce three years worth of any types of records in one hour upon anyone's verbal request. This unauthorized paraphrasing of the rule would impose an excessive burden upon Skyline Corporation.

Response to Comment 7:

Conditions D.1.6 and D.2.8 requires that records necessary to document compliance with Condition D.1.5, D.2.2(a) be kept at the source for a period of three (3) years, and then stored elsewhere for the next two (2) years provided the records can be made available within thirty (30) days after written request. Because the most recent three-year worth of records must be kept at the source, it is reasonable to assume that such records can be produced within a short time frame when OAM staff requests such data. In OAM's experience, practical requests for compliance related records can be made available within one (1) hour. 326 IAC 2-7-6 (2) states that the Permittee shall allow access to records when the inspector arrives at the source.

Comment 8:

Condition C.18(b) and C.18(c), (renumbered as C.17) General Record Keeping Requirements, Page 24 of 33 in the draft Part 70 permit should be removed.

Response to Comment 8:

This condition provides guidelines for records of preventive maintenance and response steps. 326 IAC 2-7-6(1) requires each Part 70 permit to contain compliance certification, testing, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of a Part 70 permit consistent with section 5(3) of the Part 70 permit program rule. In addition, 326 IAC 2-7-6(5)(B) requires Part 70 permits to include a means for monitoring the compliance of the source with its standards and work practices, in accordance with section 5(3). Therefore, a rule cite for 326 IAC 2-7-6 has been added to the title line for Condition C.21 on page 24 of 38 of the proposed permit to be as follows on page 22 of 35 of the final permit:

C. 167 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6(2) (B)]

- (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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Comment 9:

Condition C.18 (renumbered as C.17) General Record Keeping Requirements, Page 25 of 33 in the draft Part 70 permit should include a clause that states:

“ Instead of paper records, Skyline Corporation may contain records on alternative media, such as microfilm, computer files, magnetic tape disks or microfiche, provided that the use of such alternative media allows for expeditious inspection and review.”

Response to Comment 9:

326 IAC 2-7 does not restrict the media used for record keeping. By not specifically listing alternative media, the source is allowed to use the suggested alternative without being restricted to them as long as the record keeping requirements are met. The condition remains unchanged.

Comment 10:

Condition C.20 (renumbered as C.19) Compliance with 40 CFR 82 and 326 IAC 22-1, Page 26 of 33 in the draft Part 70 permit should be removed. These regulations do not apply to this source. Inclusion of such a condition will only serve to confuse the public and OAM or EPA compliance personnel.

Response to Comment 10:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under this rule. The condition remains unchanged.

Comment 11:

Condition D.1.3 (Testing Requirements), Page 27 of 33 in the draft Part 70 permit should be deleted. This emission unit is not required to perform any testing.

Response to Comment 11:

Condition D.1.3 clearly states that the testing of this facility is not specifically required by this permit. But in the future, if OAM feels that a test is required for particulate matter (PM) limitations specified in Condition D.1.1, then the test must be performed. Condition D.1.3 will not be deleted.

Comment 12:

Condition D.1.4 (Particulate Matter (PM)), Page 27 of 33 in the draft Part 70 permit should be removed. This condition is unreasonable and unnecessary. The saws used at Skyline Corporation mainly create particulate larger than 100 microns in diameter. If the cyclone were not operating, there would still not be emissions of particulate in excess of the limitation of Condition D.1.1.

Response to Comment 12:

There was no test performed to prove that particulate matter (PM) are bigger than 100 microns in diameter. OAM believes that Conditions D.1.4 is necessary because some of it may be less than 100 microns in diameter. Therefore, this condition will not be deleted.

Comment 13:

Condition D.1.5 and D.1.6 (Visible Emissions Notations and Record Keeping), page 27 and 28 of 33 in the draft Part 70 permit should be removed. As the potential emissions are less than the allowable emissions, there is no possibility of violating Condition D.1.1 and therefore no necessity for Condition D.1.5 and D.1.6.

Response to Comment 13:

The observation of abnormal visible emissions indicates that the source may not be operating in a manner that is consistent with the information used to determine compliance with opacity and PM emission limitations. Responding to this abnormal situation can provide information that can be used to provide an assurance that the compliance status has not been significantly affected. To determine compliance with rule 326 IAC 6-3-2 (Process Operations: Particulate Emission Limitations), visible emission notation and record keeping are necessary. Therefore, this condition will not be deleted.

Comment 14:

Condition D.2.4 (Preventive Maintenance Plan), Page 29 of 33 in the draft Part 70 permit should be removed. There is no volatile organic compounds (VOC) emission control equipment present.

Response to Comment 14:

The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that is performed on the facilities in question should be listed in the Preventive Maintenance Plan. A Preventive Maintenance Plan (PMP) is required for facilities emitting particulate matter (PM), oxides of sulfur (SO₂), or volatile organic compound (VOC) with existing applicable requirements and :

- (a) a NSPS or NESHAP applies; or
- (b) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (c) the unit does not have controls and the actual emissions exceed 25 tons per year; or
- (d) the unit would have been subject to an applicable requirement if there was not a condition limiting the potential to emit.

The surface coating facility in plants 1 and 2 has potential VOC emissions of 93.90 tons per year when operating 8,760 hours per year. In the permit application, the applicant has assumed that the actual operation schedule for each facilities to be 8,760 hours for the permitting purpose. Using the operating time of 8,760 hours per year, the actual emissions are greater than 25 tons of VOC per year. Based on these calculations, Condition D.2.4 will be written as follows:

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Comment 15:

Condition D.2.6 (Monitoring), Page 30 of 33 in the draft Part 70 permit should be removed.

Response to Comment 15:

Condition D.2.6 (Monitoring) clearly states that the additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan (PMP). Since the Preventive Maintenance Plan is required for the facility, this condition is necessary. Therefore, the proposed Condition D.2.6 will not be removed from the draft permit.

Comment 16:

Condition D.2.5(a) (Volatile Organic Compounds), Page 30 of 33 in the draft Part 70 permit, contains Condition D.2.8 but the permit ends with condition D.2.7. Skyline Corporation presumes that IDEM actually meant to refer to Condition D.2.7.

Response to Comment 16:

In the condition D.2.6 (Volatile Organic Compounds), IDEM refers to the Condition D.2.2(a) and Permit is changed as follows:

D.2.6 Volatile Organic Compounds (VOC)

(a) ~~Compliance with the VOC content and usage limitations contained in Conditions D.2.8 shall be determined pursuant to 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.~~

(a) The daily volume weighted VOC content **and usage limitations contained in Condition D.2.2 (a)** of the coatings used for each day shall be determined by using the following equation:

$$\text{lb VOC /gal less water} = 3 \text{ coats } \left\{ \text{density, lb./gal} * \text{wt. \% organic} * \text{gal of mat. Gal/unit} \right\} / \left\{ (1 - \% \text{ vol. water}) * \frac{\text{density coat, lb./gal}}{\text{density water, lb./gal}} \right\}$$

{ 3coats, gal unit}

(b) **IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

Comment 17:

In Condition D.2.7(now renumbered as D.2.7) (a), Record Keeping Requirements, Page 30 of 33 in the draft Part 70 permit, remove the reference of Condition D.2.3 from the first sentence. The effect of Condition D.2.3 is to preclude the use of air atomization spray guns. All spraying is done using aerosol cans which use an airless spray process. Condition D.2.7 (a) (1) should refer to metal substrate instead of each coating material. This change in the language clarifies that requirement.

Response to Comment 17:

Condition D.2.6 (renumbered as D.2.6) in the Draft permit has been changed as follows:

D.2.6 Record Keeping Requirements

(a) To document compliance with Conditions D.2.2 **(a)** ~~and D.2.3~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2**(a)**, ~~D.2.3~~.

(1) The amount and VOC content of each coating material and solvent **applied to metal parts of the recreational vehicles (RV) 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 day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

- (6) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, OAM has made the following changes to the proposed Part 70 permit (changes are bolded for emphasis):

1. The first paragraph on the Section A (Source Summary), on page 5 of 33 of the permit has been changed from:

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.

to be as follows, on page 5 of 35 of the final permit:

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.~~
The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

2. Section A.5 (Prior Permit Conditions Superseded), on page 5 of 33 has been deleted as follows:

~~A.5 — Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

3. Subsection (c) of Condition B.8 (Duty to Supplement and Provide Information), on page 7 of 33 of the proposed permit, has been changed from:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

to be as follows, on page 7 of 35 of the final permit:

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

4. Subsection (c) of Condition B.11 (Annual Compliance Certification), on page 8 of 33 of the proposed permit, has been changed from:

- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

to be as follows, on page 8 of 35 of the final permit:

- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

5. Condition B.12 (Preventive Maintenance Plan), on page 8 of 33 of the proposed permit has been changed from:

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

to be as follows, on page 8 of 35 of the final permit:

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission ~~units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

6. Subsection (b) of Condition B.14 (Permit Shield), on page 11 of 33 of the proposed permit, has been changed from:

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

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

to be as follows, on page 11 of 35 of the final permit:

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

- (b) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~ **Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.**

7. Condition B.16 (Deviations from Permit Requirements and Conditions), on page 11 of 33, has been changed from:

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

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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

to be as follows, on page 12 of 35 of the final permit:

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

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

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

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

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

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

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

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

8. Subsection (a) of Condition B.18 (Permit Renewal), on page 12 of 33 of the proposed permit, has been changed from:

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

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

to be as follows, on page 13 of 35 of the final permit:

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

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

9. Condition B.19 (Administrative Permit Amendment) and Condition B.20 (Minor Permit Modification) on page 13 of 33, and B.21 (Significant Permit Modification) on page 14 of 33 of the proposed permit, have been combined into one condition numbered B.19 (Permit Amendment or Modification) as follows, on page 14 of 35 of the final permit:

~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~

- ~~(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- ~~(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~

- ~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~
- ~~(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(e).~~
- ~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~
- ~~(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(d)]~~

- ~~(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~

- ~~(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~
- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

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

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

10. Due to deletion of Conditions B.20 (Minor Permit Modification) on page 13 of 33, and B.21 (Significant Permit Modification) on page 14 of 33 of the proposed permit, the title of the following conditions have been renumbered, as follows, on page 14, 15 and 16 of 35 of the final permit:

B.22 20	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12 (b)(2)]
B.23 21	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
B.24 22	Operational Flexibility [326 IAC 2-7-20]
B.25 23	Construction Permit Requirement [326 IAC 2]

11. The first paragraph of Condition B.26 (now B.24) (Inspection and Entry), on page 16 of 33 of the proposed permit, has been changed from:

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

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

to be as follows, on page 16 of 35 of the final permit:

B.26 4 Inspection and Entry [326 IAC 2-7-6(2)]

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

12. Subsection (b) of Condition B.27 (now B.25) (Transfer of Ownership or Operation), on page 17 of 33, has been changed from:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.

to be as follows, on page 17 of 35 of the final permit:

B.27 5 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

13. Condition B.28 (now B.26) (Annual Fee Payment), on page 17 of 33 of the proposed permit, has been changed from:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

to be as follows, on page 17 of 35 of the final permit:

B.28 6 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

14. The new Condition B.27 (Credible Evidence), has been added, on page 18 of 35 of the final permit, as follows:

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]
Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

15. Condition C.1 (PSD Minor Source Status), on page 18 of 33 of the proposed permit, has been changed from:

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

- (a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

to be as follows, on page 19 of 35 of the final permit:

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

- (a) The total source potential ~~emissions to emit~~ of volatile organic compounds (VOC) are less than 250 tons per ~~365 consecutive day period~~ **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 potential ~~emissions to emit~~ to 250 tons per ~~twelve (12) consecutive month period~~ **year**, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 **and 40 CFR 52.21**, before such change may occur.

16. The new Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour), on page 19 of 35 of the final permit has been added and condition C.2 (Opacity), on page 18 of 33 of the proposed permit along with other conditions has been renumbered as follows:

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

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

C.23 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.34 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.45 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

C.56 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.

17. Condition C.6 (now C.7) (Operation of Equipment), on page 18 of 33 of the proposed permit, have been changed from:

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

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

to be as follows, on page 19 of 35 of the final permit:

C.67 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. , ~~as described in Section D of this permit.~~

18. Condition C.7 (now C.8) (Asbestos Abatement Projects - Accreditation) and C.11 (Asbestos Abatement Projects), on page 18 and 20 of 33 of the proposed permit, have been combined into one Condition C.8 (Asbestos Abatement Projects) as follows, on page 20 of 35 of the final permit:

C.78 Asbestos Abatement Projects ~~—Accreditation~~ [326 IAC 14-10] [326 IAC 18]
~~[40 CFR 61.140, 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 non friable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

~~C.11 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~~

~~(c) 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(e). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RAGM 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.~~

19. Condition C.8 (now C.9) (Performance Testing), on page 19 of 33 of the proposed permit, has been changed from:

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

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

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

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

~~no later than thirty-five (35) days before the intended test date.~~

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

to be as follows, on page 21 of 35 of the final permit:

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

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

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

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

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

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

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

20. C.9 (now C.10) (Compliance Monitoring), on page 19 of 33 of the proposed permit, has been changed from:

~~C.9~~ **C.10** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

to be as follows, on page 21 of 35 of the final permit:

~~C.9~~ **C.10** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

in writing, ~~prior to the end of the initial (90) day compliance schedule 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.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. C.10 (now C.11) (Monitoring Methods), on page 19 of 33 of the proposed permit, has been changed from:

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

~~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.~~

to be as follows, on page 22 of 35 of the final permit:

~~C.10~~ **C.11** Monitoring Methods [326 IAC 3]

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

22. Condition C.11 (now C.12) (Risk Management Plan), on page 19 of 33 of the proposed permit, has been changed from:

~~C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]~~

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

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

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

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

to be as follows, on page 22 of 35 of the final permit:

C.14 2 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

23. The following rule cite has been added to the title lines of Condition C.12 (now C.13) (Compliance Monitoring Plan - Failure to Take Response Steps), on Page 22 of 35 of the final permit, as follows:

**C.12 3 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5 (3)]
[326 IAC 2-7-6] [326 IAC 1-6]**

24. Condition C.13 (now C.14) (Actions Related to Noncompliance Demonstrated by a Stack Test), on page 22 of 33 of the proposed permit has been changed from:

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

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

to be as follows, on page 23 of 35 of the final permit:

**C.14 4 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

25. Subsection (a) of Condition C.14 (now C.15) (Emission Statement), on page 22 of 33 of the proposed permit, has been changed from:

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

to be as follows, on page 24 of 35 of the final permit:

C.145 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

26. Condition C.15 (now C.16) (Monitoring Data Availability), on page 23 of 33 of the proposed permit, has been changed from:

C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

to be as follows, on page 24 of 35 of the final permit:

C.156 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

27. Subsection (a) of Condition C.16 (now C.17) (General Record Keeping Requirements), on page 23 of 33 of the proposed permit, has been changed from:

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][326 IAC 2-7-6(2) (B)]

- (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.

to be as follows, on page 25 of 35 of the final permit:

C.167 General Record Keeping Requirements [326 IAC 2-7-5(3)-(B)][326 IAC 2-7-6 (2)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the~~ **Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

28. Condition C.17 (now C.18) (General Reporting Requirements), on page 24 of 33 of the proposed permit, has been changed from:

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

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **quarterly** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

to be as follows, on page 26 of 35 of the final permit:

C.178 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **quarterly** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

29. Condition C.18 (now C.19) (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 33 the permit, has been changed from:

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

to be as follows, on page 26 of 35 of the final permit:

C.18-9 Compliance with 40 CFR 82 and 326 IAC 22-1

30. Facility Description in section D.1 and D.2, on page 26 and 28 of the proposed permit, have been changed from:

Thirty nine (39) stationary and hand-held wood cutting saws rated at a maximum throughput of 132,188 pounds per hour, particulate matter controlled by a cyclone separator and exhausting to stack identified as C-3 in plant 2;

Various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2 with a maximum capacity of manufacturing three (3) recreational vehicles per hour, with no control for overspray.

to be as follows, on page 28 and 30 of 35 of the final permit:

Facility Description [326 IAC 2-7-5(15)] Thirty nine (39) stationary and hand-held wood cutting saws rated at a maximum throughput of 132,188 pounds per hour, particulate matter controlled by a cyclone separator and exhausting to stack identified as C-3 in plant 2;

Facility Description [326 IAC 2-7-5(15)] Various aerosol cans and manual tube extrusion guns for coating recreational vehicles in the plant 1 and 2 with a maximum capacity of manufacturing three (3) recreational vehicles per hour, with no control for overspray.

31. Condition D.1.3 (Testing Requirements), on page 26 of 33 of the proposed permit, has been changed from:

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

to be as follows, on page 28 of 35 of the final permit:

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

~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~
Testing of The Permittee is not required to test this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

32. Subsection (a) of Condition D.1.5 (Visible Emissions Notations), on page 26 of 33 of the proposed permit, has been changed from:

- (a) Daily visible emission notations of the wood working saws stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

to be as follows, on page 28 of 34 of the final permit:

- (a) Daily visible emission notations of the wood working saws stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

33. Condition D.2.5 (Testing Requirements), on page 29 of 33 of the proposed permit, has been changed from:

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if the OAM requests, compliance with the volatile organic compounds (VOC) limit specified in Condition D.2.2 (a) shall be determined by a performance tests conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

to be as follows, on page 31 of 35 of the final permit:

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of The Permittee is not required to test this facility this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM** the OAM requests, compliance with the volatile organic compounds (VOC) limit specified in Condition D.2.2 (a) shall be determined by a performance tests conducted in accordance with Section C - Performance Testing. **This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.**

34. The first table of the Part 70 Operating Permit Certification, on page 31 of 33 of the proposed permit, has been changed from:

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Emergency/Deviation Occurrence Reporting Form

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

to be as follows, on page 33 of 35 of the final permit:

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

35. The final sentence of the form - Part 70 Operating Emergency/Deviation Occurrence Report (page 2 of 2), on page 33 of 33 of the proposed permit, has been changed from:

Attach a signed certification to complete this report.

As follows, on page 35 of 35 of the final permit:

~~Attach a signed certification to complete this report.~~

36. Section A.1 (General Information), on page 5 of 33 of the proposed permit has been changed from:

Responsible Official : Skyline Corporation (Formerly Nomad / Layton - Elkhart)

to be as follows, on page 5 of 35 of the final permit:

Responsible Official : ~~Skyline Corporation (Formerly Nomad / Layton - Elkhart)~~ **Mr. Mike Walter**

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

**Company Name: Skyline Corporation
Address City IN Zip: 401 County Road 15 South Plant, Elkhart, IN 46515
CP: 039-9115
Plt ID: 039-00306
Reviewer: Manoj P. Patel
Date: December 8, 1997**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Oately Cleaner	6.614	100.00%	95.0%	5.0%	95.0%	0.00%	0.03900	3.000	6.61	0.33	0.04	0.93	0.17	0.00	ERR	0%
Oately CPVC Cement	7.589	81.00%	0.0%	81.0%	0.0%	17.00%	0.01600	3.000	6.15	6.15	0.30	7.08	1.29	0.00	36.16	100%
Sun # 99 Adhesive	12.093	0.00%	0.0%	0.0%	0.0%	100.00%	0.95000	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Dicor 502 Adhesive	10.675	25.00%	0.0%	25.0%	0.0%	70.00%	0.44900	3.000	2.67	2.67	3.59	86.28	15.75	0.00	3.81	100%
Henry's 924 Adhesive	8.000	35.00%	32.0%	3.0%	32.0%	65.00%	1.12500	3.000	0.35	0.24	0.81	19.44	3.55	0.00	0.37	100%
PL-400 Adhesive	9.591	45.00%	0.0%	45.0%	0.0%	60.00%	0.27600	3.000	4.32	4.32	3.57	85.77	15.65	0.00	7.19	100%
Weld-On 773 ABS Cement	7.231	75.00%	0.0%	75.0%	0.0%	21.00%	0.06300	3.000	5.42	5.42	1.02	24.60	4.49	0.00	25.83	100%
Colorimetric MS-101 Sealant	8.006	27.50%	0.0%	27.5%	0.0%	72.00%	0.00800	3.000	2.20	2.20	0.05	1.27	0.23	0.00	3.06	100%
Colorimetric MS-102 Sealant	8.008	40.00%	0.0%	40.0%	0.0%	58.00%	0.52300	3.000	3.20	3.20	5.03	120.62	22.01	0.00	5.52	100%
Hercules Pro Dope	13.427	0.00%	0.0%	0.0%	0.0%	100.00%	0.03900	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Geocell 500 Caulk	13.344	2.00%	0.0%	2.0%	0.0%	100.00%	0.18800	3.000	0.27	0.27	0.15	3.61	0.66	0.00	0.27	100%
Rectoseal # 5 Pipe Dope	11.425	23.00%	0.0%	23.0%	0.0%	77.00%	0.00400	3.000	2.63	2.63	0.03	0.76	0.14	0.00	3.41	100%
Armstrong S553 Seam Sealer	7.589	92.00%	0.0%	92.0%	0.0%	6.00%	0.00100	3.000	6.98	6.98	0.02	0.50	0.09	0.00	116.36	100%
Sun # 41 Underlayment Sealer	9.174	0.00%	0.0%	0.0%	0.0%	100.00%	0.32700	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Mineral Spirits	6.430	100.00%	0.0%	100.0%	0.0%	0.00%	0.00400	3.000	6.43	6.43	0.08	1.85	0.34	0.00	ERR	0%
C-32 Break Cleaner	12.010	100.00%	30.0%	70.0%	30.0%	0.00%	0.00100	3.000	12.01	8.41	0.03	0.61	0.11	0.00	ERR	100%
Goof-Off	7.250	100.00%	0.0%	100.0%	0.0%	0.00%	0.00300	3.000	7.25	7.25	0.07	1.57	0.29	0.00	ERR	100%
Terp-A-Kleen	7.014	100.00%	0.0%	100.0%	0.0%	0.00%	0.21100	3.000	7.01	7.01	4.44	106.56	19.45	0.00	ERR	100%
WD-40	6.700	100.00%	0.0%	100.0%	0.0%	0.00%	0.00100	3.000	6.70	6.70	0.02	0.48	0.09	0.00	ERR	100%
C-33 Silicone Spray	5.921	100.00%	0.0%	100.0%	0.0%	0.00%	0.00400	3.000	5.92	5.92	0.07	1.71	0.31	0.00	ERR	100%
C-34 White Grease	6.670	80.00%	12.0%	68.0%	14.0%	20.00%	0.00400	3.000	5.27	4.54	0.05	1.31	0.24	0.00	22.68	100%
Boyle-Midway Wood Putty	11.676	40.00%	30.0%	10.0%	30.0%	60.00%	0.00400	3.000	1.67	1.17	0.01	0.34	0.06	0.00	1.95	100%
Color Putty	11.500	0.00%	0.0%	0.0%	0.0%	100.00%	0.00200	3.000	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0%
Rapid-Tac	9.000	100.00%	0.0%	100.0%	0.0%	0.00%	0.00400	3.000	9.00	9.00	0.11	2.59	0.47	0.00	ERR	100%
Leak Detector	8.665	100.00%	55.5%	44.5%	55.0%	0.00%	0.01600	3.000	8.57	3.86	0.19	4.44	0.81	0.00	ERR	100%
735 Undercoat	8.300	70.00%	0.0%	70.0%	0.0%	60.00%	0.00400	3.000	5.81	5.81	0.07	1.67	0.31	0.07	9.68	50%
S-W Enamel	8.070	45.40%	0.0%	45.4%	0.0%	54.60%	0.02000	3.000	3.66	3.66	0.22	5.28	0.96	0.29	6.71	75%
R-W Spray Paint	8.990	85.20%	0.0%	85.2%	0.0%	14.80%	0.00400	3.000	7.65	7.65	0.09	2.20	0.40	0.02	51.70	75%
Stain	10.800	90.00%	0.0%	90.0%	0.0%	10.00%	0.04700	3.000	9.72	9.72	1.37	32.89	6.00	0.00	97.20	100%
Dicor 901 Adhesive	8.398	60.00%	60.0%	0.0%	60.0%	40.00%	1.42900	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
	0.000	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.000	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%

State Potential Emissions

21.43 514.34 93.87 0.67

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)

Appendix B: HAP emissions Calculation

(from SKyline RV Plant)

Company Name: Skyline Corporation
Plant Location: 401 County Road 15 South Plant, Elkhart, IN 46515
County: 039-9115
Plt. ID: 039-00306
Permit Reviewer: Manoj P. Patel
Date: December 8, 1997

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	% Hexane	Weight % Xylene	Weight % MEK	% Toluene	% E.G.	Weight % Perc	Weight % TCE	Weight % E. Benze	% M.C.	Hexane (ton/yr)	Xylene (ton/yr)	MEK (ton/yr)	Toluene (ton/yr)	E.G. (ton/yr)	Perc (ton/yr)	TCE (ton/yr)	E. Ben. (ton/yr)	M.C. (ton/yr)	
Oately Cleaner	6.614	0.039	3.0			0.95									3.22							
Oately CPVC Cement	7.589	0.016	3.0			0.05									0.08							
Sun #99 Adhesive	12.093	0.950	3.0																			
Dicor 502 Adhesive	10.675	0.449	3.0				0.16									9.95						
Henry's 924 Adhesive	8.000	1.125	3.0																			
PL-400 Adhesive	9.591	0.276	3.0	0.30			0.15						10.43			5.22						
Weld-On 773 ABS Cement	7.231	0.063	3.0			0.65									3.89							
Colorimetric MS-101 Sealant	8.006	0.008	3.0		0.23						0.05			0.19							0.04	
Colorimetric MS-102 Sealant	8.008	0.523	3.0				0.40									22.01						
Hercules Pro Dope	13.427	0.039	3.0																			
Geocell 500 Caulk	13.344	0.188	3.0																			
Rectoseal # 5 Pipe Dope	11.425	0.004	3.0																			
Armstrong S553 Seam Sealer	7.589	0.001	3.0																			
Sun # 41 Underlayment Sealer	9.174	0.327	3.0																			
Mineral Spirits	6.430	0.004	3.0																			
C-32 Break Cleaner	12.010	0.001	3.0						0.40	0.30		0.30						0.06	0.05			0.05
Goof-Off	7.250	0.003	3.0		0.92									0.26								
Terp-A-Kleen	7.014	0.211	3.0																			
WD-40	6.700	0.001	3.0																			
C-33 Silicone Spray	5.921	0.004	3.0																			
C-34 White Grease	6.670	0.004	3.0	0.37									0.13									
Boyle-Midway Wood Putty	11.676	0.004	3.0																			
Color Putty	11.500	0.002	3.0																			
Rapid-Tac	9.000	0.004	3.0																			
Leak Detector	8.665	0.016	3.0					0.43									0.79					
735 Undercoat	8.300	0.004	3.0				0.15									0.07						
S-W Enamel	8.070	0.020	3.0																			
R-W Spray Paint	8.980	0.004	3.0																			
Stain	10.800	0.047	3.0		0.06		0.40							0.39		2.67						
Dicor 901 Adhesive	8.398	1.429	3.0																			

Total State Potential Emissions

10.56 0.85 7.19 39.91 0.79 0.06 0.05 0.04 0.05

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

Individual HAP: Toluene: **39.91**
 Total HAPs: **59.50**

**Appendix C: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Space Heaters at plant #1 & #2**

**Company Name: Skyline Corporation
 Address City IN Zip: 401 County Road 15 South Plant, Elkhart, IN 46515
 CP: 039-9115
 Plt ID: 039-00306
 Reviewer: Manoj P. Patel
 Date: December 8, 1997**

Heat Input Capacity*
MMBtu/hr

Potential Throughput
MMCF/yr

12.0

105.1

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.6	0.6	0.03	5.3	0.3	1.1

Space Heaters - total of 40 space heaters, each rated at 0.30 MMBtu/hr, (IDs. A-C , E-K, M-W) of plant #1 & 1,2,6-11, 15-18, 21-27 of plant #2.

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