

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Damon Corporation
Breckenridge Division - Plant 5
656 North Delaware
Nappanee, Indiana 46550**

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

Construction Permit No.: CP-039-9244-00285	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information	4
A.2	Emission Units and Pollution Control Equipment Summary	4
SECTION B	GENERAL CONDITIONS	5
B.1	General Construction Conditions	5
B.2	Effective of the Permit [IC13-15-5-3]	5
B.3	Revocation of Permits [326 IAC 2-1-9(b)]	5
B.4	Permit Review Rules [326 IAC 2]	5
B.5	First Time Operation Permit [326 IAC 2-1-4]	5
B.6	General Operation Conditions	6
B.7	Preventive Maintenance Plan [326 IAC 1-6-3]	6
B.8	Transfer of Permit [326 IAC 2-1-6]	6
B.9	Permit Revocation [326 IAC 2-1-9]	6
B.10	Availability of Permit [326 IAC 2-1-3(l)]	7
SECTION C	SOURCE OPERATION CONDITIONS	8
	Emission Limitations and Standards	
C.1	PSD Minor Source Status [326 IAC 2-2] [40 CFR52.21]	8
C.2	Opacity [326 IAC 5-1]	8
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	8
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	8
C.5	Fugitive Dust Emissions [326 IAC 6-4]	8
C.6	Operation of Equipment	8
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	8
	Compliance Monitoring Requirements	
C.8	Compliance Monitoring	8
C.9	Monitoring Methods [326 IAC 3]	9
C.10	Pressure Gauge Specification	9
C.11	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]	9
	Record Keeping and Reporting Requirements	
C.12	Annual Emission Reporting [326 IAC 2-6]	10
C.13	Monitoring Data Availability	10
C.14	Records and Notice of Malfunction [326 IAC 1-6-2]	11
C.15	General Record Keeping Requirements	11
C.16	General Reporting Requirements	12
	Stratospheric Ozone Protection	
C.17	Compliance with 40 CFR 82 and 326 IAC 22-1	13
SECTION D.1	FACILITY OPERATION CONDITIONS	
	Miscellaneous wood and non-wood cutting operations	14
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.1.1	Particulate Matter (PM) [326 IAC 6-3]	14
D.1.2	Preventive Maintenance Plan [326 IAC 1-6-3]	14
	Compliance Determination Requirements	
D.1.3	Testing Requirements [326 IAC 2-1-4(f)]	14

Compliance Monitoring Requirements

D.1.4 Visible Emission Notations 15

Record Keeping and Reporting Requirements

D.1.5 Record Keeping Requirements 15

D.1.6 Reporting Requirements 15

SECTION D.2 FACILITY OPERATION CONDITIONS

Recreational Vehicle (RV) Assembly Lines 1 and 2 16

SECTION D.3 FACILITY OPERATION CONDITIONS

Ten (1) natural gas-fired radiant space heaters (ID#s R10 through R19) 17

Malfunction Report 18 - 19

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 2-8-3(b)]

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

Responsible Official: David Everett
Source Address: 656 North Delaware, Nappanee, Indiana 46550
Mailing Address: P. O. Box 1107, Elkhart, Indiana 46515
SIC Code: 2451
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules and Part 70 Program

A.2 Emission Units and Pollution Control Equipment Summary

This permit is to construct and operate a new recreational vehicle (RV) assembly line (Line 2) with a maximum capacity of 0.75 unit per hour; increase the production through the existing assembly line (Line 1) from 0.375 to 0.75 unit per hour; and increase the usage of volatile organic compound (VOC)-based materials (e.g., adhesives, sealants, solvents, etc.). Each assembly line involves the installation of the chassis, floor, sidewalls, roof, window, cabinets, fiberglass insulation, carpet, and plumbing. This modification includes:

(a) Addition of the following equipment to the existing permitted miscellaneous wood cutting operation, which has a maximum rate of 600 pounds per hour:

- (1) one (1) table saw
- (2) one (1) radial arm saw
- (3) one (1) double miter saw

This operation is attached to a cyclone dust collector (ID# D-1).

(b) Addition of the following equipment to the existing permitted miscellaneous vinyl, metal, and plastic trimming operation, which has a maximum rate of 0.64 pound per hour:

- (1) three (3) miter saws
- (2) three (3) band saws
- (3) three (3) chop saws

This operation is not attached to any specific control device.

(c) ten (10) natural gas-fired radiant space heaters (ID#s R10 through R19), each with a maximum heat input rate of 0.125 million British Thermal Units per hour (MMBtu/hr) and exhausting through its own stack (ID#s R10 through R19).

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

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

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

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

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

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

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

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition No. B.5, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

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

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

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation

Conditions section of this permit.

Operation Conditions

B.6 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

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

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

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

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

B.8 Transfer of Permit [326 IAC 2-1-6]

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

- (a) In the event that ownership of this motor home production is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

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

B.10 Availability of Permit [326 IAC 2-1-3(I)]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

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

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

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

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

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

C.6 Operation of Equipment

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

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

Compliance Monitoring Requirements

C.8 Compliance Monitoring

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

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

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

C.9 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.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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.

Record Keeping and Reporting Requirements

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

That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

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

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

C.13 Monitoring Data Availability

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

C.14 Records and Notice of Malfunction [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

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

C.16 General Reporting Requirements

- (a) 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

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

- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) 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.17 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 CONDITION

(a) Addition of the following equipment to the existing permitted miscellaneous wood cutting operation, which has a maximum rate of 600 pounds per hour:

- (1) one (1) table saw
- (2) one (1) radial arm saw
- (3) one (1) double miter saw

This operation is attached to a cyclone dust collector (ID# D-1).

(b) Addition of the following equipment to the existing permitted miscellaneous vinyl, metal, and plastic trimming operation, which has a maximum rate of 0.64 pound per hour:

- (1) three (3) miter saws
- (2) three (3) band saws
- (3) three (3) chop saws

This operation is not attached to any specific control device.

Emissions Limitation and Standards

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Process Operations), the allowable PM emission rate from the woodworking operation shall not exceed 1.8 pounds per hour when operating at a process weight rate of 600 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 up to 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.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1-4(f)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f).

Compliance Monitoring Requirements [326 IAC 2-1-3(j) and (k)]

D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone dust collector 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 Requirements

D.1.5 Record Keeping Requirements

- (a) The Permittee shall maintain records of daily visible emission notations of the cyclone dust collector stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

There are no reporting requirements applicable to this facility.

SECTION D.2

FACILITY CONDITIONS

New recreational vehicle (RV) assembly line (Line 2) with a maximum capacity of 0.75 unit per hour; increase in production through the existing assembly line (Line 1) from 0.375 to 0.75 unit per hour; and increase in usage of volatile organic compound (VOC)-based materials (e.g., adhesives, sealants, solvents, etc.). Each assembly line involves the installation of the chassis, floor, sidewalls, roof, window, cabinets, fiberglass insulation, carpet, and plumbing.

There are no applicable requirements for these facilities.

SECTION D.3

FACILITY CONDITIONS

ten (10) natural gas-fired radiant space heaters (ID#s R10 through R19), each with a maximum heat input rate of 0.125 million British Thermal Units per hour (MMBtu/hr) and exhausting through its own stack (ID#s R10 through R19).

There are no applicable requirements for these facilities.

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

Damon Corporation, Breckenridge Division - Plant 5
Nappanee, Indiana
Permit Reviewer: Marco A. Salenda

Page 20 of 19
CP-039-9244
ID-039-00285

PAGE 2 OF 2

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Damon Corporation, Breckenridge Division - Plant 5
Source Location: 656 North Delaware, Nappanee, Indiana 46550
County: Elkhart
Construction Permit No.: CP-039-9244-00285
SIC Code: 2451
Permit Reviewer: Marco A. Salenda

The Office of Air Management (OAM) has reviewed an application from Damon Corporation, Breckenridge Division - Plant 5 relating to the construction and operation of a new recreational vehicle (RV) assembly line (Line 2) with a maximum capacity of 0.75 unit per hour; and to increase the production through the existing assembly line (Line 1) from 0.375 to 0.75 unit per hour. Each assembly line involves the installation of the chassis, floor, sidewalls, roof, window, cabinets, fiberglass insulation, carpet, and plumbing. This modification includes:

(a) Addition of the following equipment to the existing permitted miscellaneous wood cutting operation, which has a maximum rate of 600 pounds per hour:

- (1) one (1) table saw
- (2) one (1) radial arm saw
- (3) one (1) double miter saw

This operation is attached to a cyclone dust collector (ID# D-1).

(b) Addition of the following equipment to the existing permitted miscellaneous vinyl, metal, and plastic trimming operation, which has a maximum rate of 0.64 pound per hour:

- (1) three (3) miter saws
- (2) three (3) band saws
- (3) three (3) chop saws

This operation is not attached to any specific control device.

(c) ten (10) natural gas-fired radiant space heaters (ID#s R10 through R19), each with a maximum heat input rate of 0.125 million British Thermal Units per hour (MMBtu/hr) and exhausting through its own stack (ID#s R10 through R19).

Air Pollution Control Justification as Integral Part of the Process

Due to Attorney Law Judge Garretson's ruling on Kimball International, IDEM is bound to an enforcement memo of September 25, 1980 that addresses the determination of potential emissions from woodworking operations (the machining of lumber to produce dimensioned piece for furniture or other carpentry, including sawing, drilling, routing, milling, planing, sanding, etc.).

This memo stipulates that potential emissions from any new woodworking operation will be

calculated such that any control device (baghouse or cyclone) is considered part of the process. Therefore, emissions are after controls. This concept is consistent with the definition of potential emissions under 326 IAC 1-2-55. According to this definition, potential emissions are "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."

Therefore, the permitting level will be determined using the potential emissions after the cyclone dust collector (ID# D-1). Operating conditions will be specified in the proposed permit that this cyclone dust collector shall operate at all times when wood cutting is being performed.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
D-1	wood cutting	19	1.25	7,300	90
R10, R11, R12, R15, R16, R17, R18, and R19	radiant space heaters	22 each	0.33 each	275,000 each	--
R13 and R14	radiant space heaters	26 each	0.33 each	275,000 each	--

Recommendation

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

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

An application for the purposes of this review was received on November 25, 1997, with additional information received on December 19, 1997.

Emissions Calculations

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

Total Potential and Allowable Emissions

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

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	8.0	4.4
Particulate Matter (PM-10)	2.9	2.9
Sulfur Dioxide (SO ₂)	0.0	0.0
Volatile Organic Compounds (VOC)	34	34
Carbon Monoxide (CO)	0.0	0.1
Nitrogen Oxides (NO _x)	0.0	0.5
Single Hazardous Air Pollutant (HAP)	4.5	4.5
Combination of HAPs	12	12

- (a) Allowable PM emissions are determined from the applicability of rule 326 IAC 6-3 (Particulate Emission Limitation for Process Operations). See attached spreadsheets for detailed calculations.
- (b) Allowable VOC emissions are equivalent to the potential VOC emissions for this case. Therefore, the potential emissions become the allowable emissions.
- (c) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has also been designated as attainment or unclassifiable for total suspended particulates (TSP), particulate matter less than 10 microns (PM-10), sulfur dioxide (SO₂), and carbon monoxide (CO). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.7
PM-10	0.5
SO ₂	0.0
VOC	2.2
CO	0.4
NO _x	1.5

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Exemption Letter (CP 039-4086) issued on October 26, 1994

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	4.4	2.9	0.0	34	0.1	0.5
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **CP-039-9244-00285**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63) applicable to this facility.

State Rule Applicability

- (a) 326 IAC 2-6 (Emission Reporting)
The source is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons per year of VOC. Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of all facilities. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.
- (b) 326 IAC 5-1 (Visible Emissions)
Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
 - (1) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
 - (2) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- (b) 326 IAC 6-3 (Particulate Emission Limitation for Process Operations)
This rule requires that particulate matter (PM) emissions from the wood cutting operation to not exceed 1.8 pounds per hour. This is based on a process weight rate of 600 pounds per hour.

- (c) 326 IAC 8-1-6 (General VOC Reduction Requirements for New Facilities)
This rule does not apply to any of the two (2) assembly lines since neither facility has potential emissions greater than 25 tons per year of VOC.

Air Toxic Emissions

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

- (a) This modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of the equipment contained herein will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-9244, PIt ID 039-00285.**

Appendix A: Emission Calculations

Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Radiant Space Heaters

Company Name: Damon Corporation, Breckenridge Division - Plant 5
 Address City IN Zip: 656 North Delaware, Nappanee, Indiana 46550
 CP: 039-9244
 Plt ID: 039-00285
 Reviewer: Marco A. Salenda
 Date: November 3, 1997

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.3	11.0

	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	0.1	0.1	0.0	0.5	0.0	0.1

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

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Damon Corporation, Breckenridge Division - Plant 5
Source Location: 656 North Delaware, Nappanee, Indiana 46550
County: Elkhart
Construction Permit No.: CP-039-9244-00285
SIC Code: 2451
Permit Reviewer: Marco A. Salenda

On February 12, 1998, the Office of Air Management (OAM) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Damon Corporation, Breckenridge Division - Plant 5 had applied for a construction permit to construct and operate a new recreational vehicle (RV) assembly line (Line 2) with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 2, 1998, Damon Corporation submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

Comment 1

In reference to condition C.15 (General Record Keeping Requirements), the requirement that records be "available within one (1) hour upon verbal request of an IDEM, OAM, representative" is not required in the rules and would cause an undue burden to be placed upon the permittee. Damon Corporation proposes that the language be stricken and the following language be substituted:

"available within 14 calendar days upon written request of an IDEM, OAM, representative"

Response 1

326 IAC 2-1-3(j)(5) provides IDEM, OAM, the authority to require submission of compliance related records upon its request. Condition C.15 requires that records necessary to document compliance be kept at the source for a period of three (3) years, and then may be 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 years 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, even with large sources, practical requests for compliance related records can be made available within one hour upon verbal request.

Comment 2

In reference to the Compliance Monitoring Requirements subsection in section D of the proposed permit, the air rules quoted (326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1)) do not apply to the proposed construction permit. The rules are intended to regulate a Federally Enforceable State Operating Permit (FESOP) not a construction permit.

Response 2

IDEM realizes that 326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1) are not the appropriate rules to require compliance monitoring conditions in a construction permit. The proper rule cites are 326 IAC 2-1-3(j) through (k). The permit has been updated to incorporate the proper rule cite.

In addition to the above changes due to comments, the first paragraph of the project description has been revised as follows:

This permit is to construct and operate a new recreational vehicle (RV) assembly line (Line 2) with a maximum capacity of 0.75 unit per hour; ~~and~~ increase the production through the existing assembly line (Line 1) from 0.375 to 0.75 unit per hour; **and increase the usage of volatile organic compound (VOC)-based materials (e.g., adhesives, sealants, solvents, etc.).** Each assembly line involves the installation of the chassis, floor, sidewalls, roof, window, cabinets, fiberglass insulation, carpet, and plumbing. This modification includes: . . .

This change does not affect any conditions in the proposed permit.