FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Holly Park, Inc.
51700 Lovejoy Drive
Middlebury, Indiana 46540

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F 039-9757-00489	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary mobile home manufacturing source.

Authorized individual:	Brian Smith
Source Address:	51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address:	51700 Lovejoy Drive, Middlebury, Indiana 46540
Phone Number:	219 - 825 - 3700
SIC Code:	3710
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following independent and parallel facilities, collectively known as EU-1:

(a) One (1) single wide construction facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.

(b) One (1) double wide construction facility, known as Plant 2, installed in 1997,consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Water-based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3-2)

(e) Paved and unpaved roads and parking lots with public access.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Grinding and machining operations controlled with fabric filters (baghouse BH2 and portable baghouses BH3 and BH4), scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3-2)

(h) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP. Brief description: Maintenance welding HAP is manganese compounds less than 5 percent weight. Holly Park, Inc. uses one (1) pound box of AWS E7014 per six (6) months. (326 IAC 6-3-2)

(i) Woodworking operations = 0.015 pounds per hour PM_{10}, drywall trimming = 0.010 pounds per hour PM_{10}, blown-in attic insulation = 0.97 pounds per hour PM_{10}. (326 IAC 6-3-2)

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, when applicable 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.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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 2-8-4(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 2-8-6]

(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 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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 2-8-4(5)(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 2-8-3(f)] [326 IAC 2-8-4(5)(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. 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, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on

the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

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

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

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan 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. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

(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 2-8-12.

(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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-3(c)(6) 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 2-8 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 material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except

those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(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.

(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 until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-1.1 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(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 2-8-15(a) and the following additional conditions:

(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 "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). 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.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, 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 FESOP 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 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application 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

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor 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(3)]

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. The provisions of 326 IAC 9-1-2 are not federally enforceable.

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 2-8-5(a)(4)]

Except as otherwise provided in this permit, 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 units vented to the control equipment are in operation.

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

Testing Requirements [326 IAC 2-8-4(3)]

C.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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

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

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

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

(b) All test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D 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.13 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 (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days from the date of issuance of this permit.

The ERP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while

the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

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

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual 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 submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). 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

(b) 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.19 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 in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan 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.21 General Reporting Requirements [326 IAC 2-8-4(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. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(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. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.22 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

Facility Description [326 IAC 2-8-4(10)]:

Independent and parallel facilities, collectively known as EU-1:

(a) One (1) single wide construction facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.

(b) One (1) double wide construction facility, known as Plant 2, installed in 1997,consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the surface coating operations was determined to be material substitution which limits the potential VOC delivered to the applicators to 218.7 tons per twelve (12) consecutive month period from Plants 1 and 2, known as EU-1. The maximum VOC content of any coating shall be 7.16 pounds of VOC per gallon of coating less water. The following management and work practices shall apply:

(a) Operator training course.

(b) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.

(c) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(d) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.

(e) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(f) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spill-age on the floor.

(g) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The volatile organic compound (VOC) delivered to the coating applicators in EU1 (Plants 1 and 2) shall not exceed a total of 97.5 tons per twelve (12) consecutive month period. This will limit the VOC emissions from the entire source, including insignificant activities, to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 HAPs Limitations [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators in Plants 1 and 2 shall not exceed a total of ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The combination of HAPs delivered to the coating applicators in Plants 1 and 2 shall not exceed a total of twenty-four and seven tenths (24.7) tons per twelve (12) consecutive month period. This will limit the HAPs emissions from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 PM_{10} Limitation (326 IAC 2-8-4)

Pursuant to 326 IAC 2-8-4, PM_{10} emissions from the construction and assembly activities of Plant 1, EU1, shall not exceed 18.1 pounds per hour (79.1 tons per year) from Stack BH1 and general ventilation. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable particulate matter (PM) from the surface coating operations shall be limited by the following:

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:

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

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the construction and assembly operations utilizing BH1 shall not exceed 6.51 pounds per hour when operating at a process weight rate of 1.99 tons 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:

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

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is

required by IDEM, compliance with the PM_{10} and PM limits specified in Conditions D.1.4 and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 as well as the HAPs usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC and HAPs Emissions

Compliance with Conditions D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compounds, worst case single HAP and combination of HAPs usage for the most recent month and twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

(a) Monthly inspections shall be performed of the coating emissions from the general ventilation and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.2 and D.1.3.

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

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAPs usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.10 the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

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

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3-2)

(g) Grinding and machining operations controlled with fabric filters (baghouse BH2 and portable baghouses BH3 and BH4), scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3-2)

(h) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP. Brief description: Maintenance welding HAP is manganese compounds less than 5 percent weight. Holly Park, Inc. uses one (1) pound box of AWS E7014 per six (6) months. (326 IAC 6-3-2)

(i) Woodworking operations = 0.015 pounds per hour PM_{10}, drywall trimming = 0.010 pounds per hour PM_{10}, blown-in attic insulation = 0.97 pounds per hour PM_{10}. (326 IAC 6-3-2)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facilities shall not exceed allowable PM emission rate based on the following equation:

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

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

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) 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 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 2-8-4(3)(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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_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: _____

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

FESOP Quarterly Report

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489
Facility: EU1 (Plants 1 and 2)
Parameter: VOC Delivered to the Applicators for EU1 (Plants 1 and 2)
Limit: 97.5 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489
Facility: EU1 (Plants 1 and 2)
Parameter: Single HAP Delivered to the Applicators for EU1 (Plants 1 and 2)
Limit: Less than Ten (10) tons per twelve (12) consecutive month period

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489
Facility: EU1 (Plants 1 and 2)
Parameter: Combination of HAPs Delivered to the Applicators for EU1 (Plants 1 and 2)
Limit: Twenty-four and seven tenths (24.7) tons per twelve (12) consecutive month period

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Holly Park, Inc.
Source Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
Mailing Address: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP No.: F 039-9757-00489

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Holly Park, Inc.**
Source Location:	**51700 Lovejoy Drive, Middlebury, Indiana 46540**
County:	**Elkhart**
FESOP:	**F 039-9757-00489**
SIC Code:	**3710**
Permit Reviewer:	**Mark L. Kramer**

On November 29, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Holly Park, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a mobile home manufacturing source. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

On December 21, 1999, Robert D. Waugaman of Bruce Carter Associates, submitted comments on the proposed FESOP on behalf of Holly Park, Inc. If the permit language is changed, deleted language appears as ~~strikeouts~~, and new language is **bolded**. The comments are as follows:

Comment 1:

D.1.1(f) Holly Park requests this condition be removed as an over burdensome requirement that would not have any noticeable net effect on over spray emissions at this facility. Based on the TSD, potential over spray emissions from this source result in less than one (1) ton of PM per year. This is less than the exempt level for PM and PM_{10}.

Response 1:

Condition D.1.1(f) states:

(f) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spillage on the floor.

This condition has not been deleted since training to minimize overspray and maximize transfer efficiency of the coating material to the substrate results in lower coating material usage and therefore reduces VOC emissions as well as PM overspray.

Comment 2:

D.1.1(h) This condition require that “odd lot/batch overrun coatings” be reused. This is not relevant at this source. Holly Park requests that this condition be removed.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD)
for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	**Holly Park, Inc.**
Source Location:	**51700 Lovejoy Drive, Middlebury, Indiana 46540**
County:	**Elkhart**
SIC Code:	**3710**
Operation Permit No.:	**F 039-9757-00489**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed a FESOP application from Holly Park relating to the operation of a mobile home manufacturing source.

Source Definition

This mobile home manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540; and

(b) Plant 2 is located at 51700 Lovejoy Drive, Middlebury, Indiana 46540.

Since the two (2) plants are located on contiguous 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 no permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted, independent and parallel facilities/units, collectively known as EU-1:

(a) One (1) single wide construction facility, known as Plant 1, installed in 1995, consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment, exhausted to GV 3 through GV 7 and one (1) baghouse, known as BH1, capacity: 1.5 floors per hour.

(b) One (1) double wide construction facility, known as Plant 2, installed in 1997,consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component

shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12, capacity: 1.5 floors per hour.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Water-based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3-2)

(e) Paved and unpaved roads and parking lots with public access.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Grinding and machining operations controlled with fabric filters (baghouse BH2 and portable baghouses BH3 and BH4), scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3-2)

(h) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP. Brief description: Maintenance welding HAP is manganese compounds less than 5 percent weight. Holly Park, Inc. uses one (1) pound box of AWS E7014 per six (6) months. (326 IAC 6-3-2)

(i) Woodworking operations = 0.015 pounds per hour PM_{10}, drywall trimming = 0.010 pounds per hour PM_{10}, blown-in attic insulation = 0.97 pounds per hour PM_{10}. (326 IAC 6-3-2)

Existing Approvals

There are no existing approvals for this source. The construction permit application for this source, CP 039-9524-00489, received February 27, 1998 has been incorporated into this proposed FESOP.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

A Construction Permit application (CP 039-9524-00489) was received on February 27, 1998 and was administratively combined by IDEM with the FESOP application. An administratively complete FESOP application for the purposes of this review was received on May 8, 1998. Additional information was received on August 14 and 24, 1998, March 2, September 13, and November 9 and 10, 1999.

Emission Calculations

See pages 1 - 5 of 7 of Appendix A of this document for detailed emissions calculations for the significant emission units and pages 6 and 7 of 7 for the insignificant natural gas combustion emissions.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design including insignificant activities. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	**Potential To Emit** (tons/year)
PM	537
PM_{10}	537
SO_2	0.034
VOC	230
CO	4.80
NO_X	5.70

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

HAPs	**Potential To Emit** (tons/year)
Xylene	13.1
Toluene	24.8

HAPs	Potential To Emit (tons/year)
Ethylbenzene	2.60
MDI	0.00005
Hexane	0.135
MEK	4.18
Vinyl Acetate	0.283
Perchloroethylene	1.92
Trichloroethylene	1.28
Ethylene Glycol	1.54
Methylene Chloride	1.49
Dimethylacyclohexlamine	0.660
TOTAL	52.1

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1 (29)) 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.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data. Total actual HAPs were provided in the application.

Pollutant	Actual Emissions (tons/year)
PM	-
PM_{10}	-
SO_2	-
VOC	28.0

Pollutant	Actual Emissions (tons/year)
CO	-
NO_X	-
Total HAPs	7.05

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Plants 1 & 2, EU-1 (coating)	0.948	0.948	0.00	97.5	0.00	0.00	24.7
Plant 1 EU-1 Process Activities	4.51 (28.5)	4.51 (79.1)	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	20.0	20.0	0.034	2.5	4.80	5.70	0.3
Total Emissions	25.5 (49.1)	25.5 <100	0.034	<100	4.80	5.70	<25

The values in parentheses reflect the allowable PM emissions pursuant to 326 IAC 6-3-2 and the balance of the allowable PM_{10} emissions to meet the requirements of 326 IAC 2-8.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ, since all wood being coated is structural and the HAPs are limited below applicability levels of ten (10) and twenty-five (25) tons per year for a single and combination of all HAPs, respectively.

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 in Elkhart County of VOC. 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 2-8-4 (FESOP: permit content)

Pursuant to this rule, the amount of PM_{10} and VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-8, do not apply.

326 IAC 5-1 (Opacity)

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

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (Construction and operating permit requirements: new source toxics control)

The source has agreed to limit a single HAP to less than ten (10) tons per year and the combination of all HAPs to less than twenty-five (25) tons per year from the EU-1 (Plant 1 and Plant 2). Therefore, the requirements of this rule are not applicable.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable particulate matter (PM) from the surface coating operations shall be limited by the following:

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:

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

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the construction and assembly operations utilizing BH1 shall not exceed the following pounds per hour limits when operating at the specified process weight rates. The pounds per hour limitation was calculated with the following equation:

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

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

Operations Associated With Baghouse	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
BH1	1.99	6.51	1.03

The baghouse, known as BH1 shall be in operation at all times the associated equipment is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Since the potential VOC emissions from Plants 1 and 2, EU-1, of 227 tons per year from surface coating structural wood and dry wall are greater than twenty-five (25) tons per year, 326 IAC 8-1-6 is applicable. Holly Park, Inc. submitted a Best Available Control Technology (BACT) analysis which evaluated several control options.

In addition, the U.S. EPA's RACT/ BACT/LAER Clearinghouse records were reviewed to identify prior determinations of BACT for similar manufacturing facilities. None of the RACT, BACT or LAER determinations were listed for operations similar to those at Holly Park, Inc. Only one (1) BACT determination by IDEM was for operations similar to those at Holly Park, Inc. At this source, BACT was determined to be the use of air assisted airless spray applicators, compliant cleaners, and good housekeeping practices.

Of the add-on control options reviewed, only four (4) add-on controls were deemed to be technically feasible in addition to substitution of materials. The cost of the add-on controls were not economically feasible ranging from $10,744 to $27,360 per ton of VOC controlled.

BACT for the surface coating operations was determined to be material substitution which limits the VOC delivered to the applicators to 218.7 tons per twelve (12) consecutive month period from Plants 1 and 2, known as EU-1, with a maximum VOC content of any coating of 7.16 pounds of VOC per gallon of coating less water. The following management and work practices shall apply:

(a) Operator training course.

(b) The cleanup solvent containers used to transport solvent from drums to work areas shall be closed containers having soft gasketed spring-loaded closures.

(c) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(d) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are tightly closed.

(e) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(f) The application equipment operators shall be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency as well as minimize spillage on the floor.

(g) Coatings shall be used that contain the lowest levels VOC possible, while still meeting customer quality, performance and price objectives. The use of exempt solvents, such as water, acetone and methyl acetate shall be used to the greatest degree practicable.

(h) Odd lot/batch overrun coatings will be reused as much as possible to reduce hazardous waste and the related impact on the environment.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

This mobile home manufacturing source is not subject to the requirements of this rule since all wood and wood components being coated are structural and do not meet the definition of furniture specify in the rule. Therefore, since there are no other Article 8 rules applicable to this source, this source is subject to the requirement of 326 IAC 8-1-6.

State Rules Insignificant Activities

326 IAC 6-3-2 (Process Operations)

The allowable PM emission rate from the double wide construction facility, known as Plant 2, installed in 1997,consisting of the following activities: floor substrate to steel frame, fixture assembly, wall construction and assembly, ceiling construction and assembly, roof construction and assembly, component shelling and assembly, roof shingling, floor cleanup and floor packaging and shipment exhausted to GV 8 through GV 12 and three (3) baghouses, known as BH2, BH3, and BH4, shall not exceed allowable PM emission rate based on the following equation:

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

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

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the

source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in 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 this source are as follows:

(a) The surface coating operations have applicable compliance monitoring conditions as specified below:

(1) The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

(2) Monthly inspections shall be performed of the coating emissions from the general ventilation and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3-2, 326 IAC 8-1-6 and 326 IAC 2-8 (FESOP).

(b) The construction and assembly operations have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the construction and/or assembly operations stack exhaust BH1 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 Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouse BH1 controlling the construction and/or assembly operations in Plant 1, at least once per shift when the construction or assembly activities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse BH1 shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency

and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the construction and assembly activities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Note that the baghouse BH2, and portable baghouses BH3 and BH4 and their associate processes have been deemed insignificant activities.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

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

(b) See attached calculations for detailed air toxic calculations in Appendix A on pages 3, 4 and 7 of 7.

Conclusion

The operation of this a mobile home manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F039-9757-00489.

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

Company Name: Holly Park, Inc.
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-9757
Plt ID: 039-00489
Reviewer: Mark L Kramer
Date: May 8, 1998

BACT Analysis with Material Substitution

Material **GV 3 - 12**	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (units/hour)	Flash-off (fraction)	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 tons per year	lb VOC /gal solids	Transfer Efficiency
BPK 200 120440	7.29	73.81%	0.00%	73.81%	0.00%	3.70%	0.083	3.000	100.00%	5.38	5.38	1.34	32.16	5.87	0.00	145.43	100.00%
INSTA-SHINE 458	8.00	78.11%	60.10%	18.01%	57.70%	82.00%	0.080	3.000	100.00%	3.41	1.44	0.35	8.30	1.51	0.00	1.76	100.00%
FOAMSEAL F2100A	10.33	50.00%	0.00%	50.00%	0.00%	0.00%	0.564	3.000	0.0001%	5.17	5.17	0.00	0.00	0.00	0.00	N/A	100.00%
FOAMSEAL F2100	8.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.580	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100.00%
SHEARWALL E-72 ADHESIVE 244683	9.00	36.13%	0.00%	36.13%	0.00%	50.50%	1.872	3.000	100.00%	3.25	3.25	18.26	438.28	79.99	0.00	6.44	100.00%
CLEANER & DEGREASER FCC002290	5.86	99.76%	0.00%	99.76%	0.00%	0.00%	0.006	3.000	100.00%	5.85	5.85	0.11	2.53	0.46	0.00	N/A	100.00%
LAP CEMENT	8.15	24.00%	0.00%	24.00%	0.00%	70.10%	3.099	3.000	100.00%	1.96	1.96	18.18	436.44	79.65	0.00	2.79	100.00%
MINERAL SPIRITS R10700	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.059	3.000	100.00%	6.58	6.58	1.16	27.95	5.10	0.00	N/A	100.00%
JOINT FILLER A30410	10.19	6.20%	0.00%	6.20%	0.00%	91.20%	2.154	3.000	100.00%	0.63	0.63	4.08	97.98	17.88	0.00	0.69	100.00%
LATEX CAULK 73-931	11.83	8.45%	0.00%	8.45%	0.00%	0.00%	0.165	3.000	100.00%	1.00	1.00	0.49	11.88	2.17	0.00	N/A	100.00%
DAP QUICK SEAL 18001	12.06	36.49%	32.00%	4.49%	46.35%	53.65%	0.033	3.000	100.00%	1.01	0.54	0.05	1.29	0.23	0.00	1.01	100.00%
DAP SILICONE CAULK	8.52	5.00%	0.00%	5.00%	0.00%	97.00%	0.081	3.000	100.00%	0.43	0.43	0.10	2.48	0.45	0.00	0.44	100.00%
ABS CEMENT 30889	7.08	76.50%	0.00%	76.50%	0.00%	35.00%	0.054	3.000	100.00%	5.42	5.42	0.88	21.06	3.84	0.00	15.47	100.00%
#41 GREEN FLOOR SEALER 41-XX	8.60	79.00%	79.00%	0.00%	81.56%	21.00%	0.090	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
SPREAD-MOR RE-BOND LATEX ADHESIVE 924	8.00	50.75%	47.00%	3.75%	45.14%	60.00%	0.126	3.000	100.00%	0.55	0.30	0.11	2.72	0.50	0.00	0.50	100.00%
TANNER MB 46 XA-2675	9.50	67.00%	66.70%	0.30%	76.07%	23.60%	3.788	3.000	100.00%	0.12	0.03	0.32	7.77	1.42	0.00	0.12	100.00%
GRUNDY'S SURFACE CEMENT	9.17	27.04%	0.00%	27.04%	0.00%	70.00%	0.407	3.000	100.00%	2.48	2.48	3.03	72.66	13.26	0.00	3.54	100.00%
PERMATHANE SM7100	13.32	3.00%	0.00%	3.00%	0.00%	3.00%	0.137	3.000	100.00%	0.40	0.40	0.16	3.94	0.72	0.00	13.32	100.00%
STAYPUT IV SPRAY ADHESIVE	7.58	85.00%	0.00%	85.00%	0.00%	23.00%	0.006	3.000	100.00%	6.44	6.44	0.12	2.78	0.51	0.00	28.01	100.00%
MANUS SEAL 27A	8.17	25.50%	0.00%	25.50%	0.00%	58.00%	0.037	3.000	100.00%	2.08	2.08	0.23	5.55	1.01	0.00	3.59	100.00%
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.00%	0.00%	0.00%	0.00%	77.50%	0.019	3.000	0.0001%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PVC CLEANER 30776	6.61	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	3.000	100.00%	6.61	6.61	0.08	1.90	0.35	0.00	N/A	100.00%
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	40.02%	0.00%	40.02%	0.00%	65.20%	0.004	3.000	100.00%	4.10	4.10	0.05	1.18	0.22	0.0808	6.29	75.00%
CYCLO BRAKE & PARTS CLEANER C-32	12.00	28.00%	0.00%	28.00%	0.00%	0.00%	0.027	3.000	100.00%	3.36	3.36	0.27	6.53	1.19	0.7663	N/A	75.00%
CYCLO SILICONE SPRAY C-33	5.91	91.75%	0.00%	91.75%	0.00%	5.34%	0.015	3.000	100.00%	5.42	5.42	0.24	5.86	1.07	0.0240	101.54	75.00%
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	80.00%	0.00%	80.00%	0.00%	60.00%	0.004	3.000	100.00%	5.33	5.33	0.06	1.53	0.28	0.0175	8.88	75.00%
CYCLO BRAKE AWAY C-10	7.46	96.00%	0.00%	96.00%	0.00%	4.00%	0.005	3.000	100.00%	7.16	7.16	0.11	2.58	0.47	0.0049	179.04	75.00%
DAP SPRAY-N-GO ALL COLORS	6.66	72.53%	0.00%	72.53%	0.00%	15.00%	0.009	3.000	100.00%	4.83	4.83	0.13	3.13	0.57	0.0541	32.20	75.00%
State Potential Emissions			**Add worst case coating to all solvents**									**49.9**	**1198**	**218.72**	**0.948**		

Control Technology Emissions (Combustion)																
						Emission Factors							Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
										0.000	**0.000**	per hour	per day	tons/yr	tons/yr	
Controlled Emissions due to Surface Coating Operations and Controls												**49.9**	**1198**	**218.72**	**0.948**	

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) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
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) * Flash-off
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) * Flash-off
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
Baghouse Operations

Company Name: Holly Park, Inc.
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP: F 039-9757
Plt ID: 039-00489
Reviewer: Mark L Kramer
Date: May 8, 1998

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
BH-1	**98.0%**	**0.015**	**8000.0**	**51.4**	**225.26**	**1.029**	**4.51**
Insignificant	Activities						
BH-2	98.0%	0.030	2725.0	35.0	153.46	0.701	3.07
BH-3	98.0%	0.030	1900.0	24.4	107.00	0.489	2.14
BH-4	98.0%	0.030	650.0	8.4	36.60	0.167	0.73
			Total	Insig Only	297.1		5.9

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Allowable Emissions (tons/yr)
BH-1	3985	1.99	6.51	28.5
BH-2	Insignificant Activity			
BH-3	Insignificant Activity			
BH-4	Insignificant Activity			

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Holly Park, Inc.
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP: F 039-9757
Plt ID: 039-00489
Reviewer: Mark L Kramer
Date: May 8, 1998

INSIGNIFICANT ACTIVITIES

		Each mmBtu/hr	Total mmBtu/hr
Infra-red Radiant	HU 1 - 13 (Plant 1)	0.2	2.600
	HU 14 - 26 (Plant 2	0.2	2.600
	HU 27 (Plant 1)	0.125	0.125
	HU 28 (Plant 2)	0.125	0.125
Forced Air	HU 29 (Plant 1)	0.6	0.600
	HU 30 (Plant 2)	0.6	0.600
Infra-red Radiant	HU 31 - 46 (Plant 1	0.2	3.200
	HU 47 - 62 (Plant 2	0.2	3.200
		Total	13.05

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.050	114.3

Pollutant	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1086	0.4344	0.0343	5.7159	0.3144	4.8014

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Holly Park, Inc.
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP: F 039-9757
Plt ID: 039-00489
Reviewer: Mark L Kramer
Date: May 8, 1998

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.200E-04	6.859E-05	4.287E-03	1.029E-01	1.943E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.858E-05	6.287E-05	8.002E-05	2.172E-05	1.200E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Company Name: Holly Park, Inc.
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-9757
Plt ID: 039-00489
Reviewer: Mark L Kramer
Date: May 8, 1998

Material **GV 3 - 12**	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (units/hour)	Flash-off (fraction)	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 tons per year	lb VOC /gal solids	Transfer Efficiency
BPK 200 120440	7.29	73.81%	0.00%	73.81%	0.00%	3.70%	0.083	3.000	100.00%	5.38	5.38	1.34	32.16	5.87	0.00	145.43	100.00%
INSTA-SHINE 458	8.00	78.11%	60.10%	18.01%	57.70%	82.00%	0.080	3.000	100.00%	3.41	1.44	0.35	8.30	1.51	0.00	1.76	100.00%
FOAMSEAL F2100A	10.33	50.00%	0.00%	50.00%	0.00%	0.00%	0.564	3.000	0.0001%	5.17	5.17	0.00	0.00	0.00	0.00	N/A	100.00%
FOAMSEAL F2100	8.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.580	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100.00%
SHEARWALL E-72 ADHESIVE 244683	9.00	36.13%	0.00%	36.13%	0.00%	50.50%	1.872	3.000	100.00%	3.25	3.25	18.26	438.28	79.99	0.00	6.44	100.00%
CLEANER & DEGREASER FCC002290	5.86	99.76%	0.00%	99.76%	0.00%	0.00%	0.006	3.000	100.00%	5.85	5.85	0.11	2.53	0.46	0.00	N/A	100.00%
LAP CEMENT	8.58	25.18%	0.00%	25.18%	0.00%	74.70%	3.099	3.000	100.00%	2.16	2.16	20.09	482.06	87.98	0.00	2.89	100.00%
MINERAL SPIRITS R10700	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.059	3.000	100.00%	6.58	6.58	1.16	27.95	5.10	0.00	N/A	100.00%
JOINT FILLER A30410	10.19	6.20%	0.00%	6.20%	0.00%	91.20%	2.154	3.000	100.00%	0.63	0.63	4.08	97.98	17.88	0.00	0.69	100.00%
LATEX CAULK 73-931	11.83	8.45%	0.00%	8.45%	0.00%	0.00%	0.165	3.000	100.00%	1.00	1.00	0.49	11.88	2.17	0.00	N/A	100.00%
DAP QUICK SEAL 18001	12.06	36.49%	32.00%	4.49%	46.35%	53.65%	0.033	3.000	100.00%	1.01	0.54	0.05	1.29	0.23	0.00	1.01	100.00%
DAP SILICONE CAULK	8.52	5.00%	0.00%	5.00%	0.00%	97.00%	0.081	3.000	100.00%	0.43	0.43	0.10	2.48	0.45	0.00	0.44	100.00%
ABS CEMENT 30889	7.08	76.50%	0.00%	76.50%	0.00%	35.00%	0.054	3.000	100.00%	5.42	5.42	0.88	21.06	3.84	0.00	15.47	100.00%
#41 GREEN FLOOR SEALER 41-XX	8.60	79.00%	79.00%	0.00%	81.56%	21.00%	0.090	3.000	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
SPREAD-MOR RE-BOND LATEX ADHESIVE 924	8.00	50.75%	47.00%	3.75%	45.14%	60.00%	0.126	3.000	100.00%	0.55	0.30	0.11	2.72	0.50	0.00	0.50	100.00%
TANNER MB 46 XA-2675	9.50	67.00%	66.70%	0.30%	76.07%	23.60%	3.788	3.000	100.00%	0.12	0.03	0.32	7.77	1.42	0.00	0.12	100.00%
GRUNDY'S SURFACE CEMENT	9.26	27.04%	0.00%	27.04%	0.00%	70.00%	0.407	3.000	100.00%	2.50	2.50	3.06	73.37	13.39	0.00	3.58	100.00%
PERMATHANE SM7100	13.32	3.00%	0.00%	3.00%	0.00%	3.00%	0.137	3.000	100.00%	0.40	0.40	0.16	3.94	0.72	0.00	13.32	100.00%
STAYPUT IV SPRAY ADHESIVE	7.58	85.00%	0.00%	85.00%	0.00%	23.00%	0.006	3.000	100.00%	6.44	6.44	0.12	2.78	0.51	0.00	28.01	100.00%
MANUS SEAL 27A	8.17	25.50%	0.00%	25.50%	0.00%	58.00%	0.037	3.000	100.00%	2.08	2.08	0.23	5.55	1.01	0.00	3.59	100.00%
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.00%	0.00%	0.00%	0.00%	77.50%	0.019	3.000	0.0001%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
PVC CLEANER 30776	6.61	100.00%	0.00%	100.00%	0.00%	0.00%	0.004	3.000	100.00%	6.61	6.61	0.08	1.90	0.35	0.00	N/A	100.00%
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	40.02%	0.00%	40.02%	0.00%	65.20%	0.004	3.000	100.00%	4.10	4.10	0.05	1.18	0.22	0.0808	6.29	75.00%
CYCLO BRAKE & PARTS CLEANER C-32	12.00	28.00%	0.00%	28.00%	0.00%	0.00%	0.027	3.000	100.00%	3.36	3.36	0.27	6.53	1.19	0.7663	N/A	75.00%
CYCLO SILICONE SPRAY C-33	5.91	91.75%	0.00%	91.75%	0.00%	5.34%	0.015	3.000	100.00%	5.42	5.42	0.24	5.86	1.07	0.0240	101.54	75.00%
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	80.00%	0.00%	80.00%	0.00%	60.00%	0.004	3.000	100.00%	5.33	5.33	0.06	1.53	0.28	0.0175	8.88	75.00%
CYCLO BRAKE AWAY C-10	7.46	96.00%	0.00%	96.00%	0.00%	4.00%	0.005	3.000	100.00%	7.16	7.16	0.11	2.58	0.47	0.0049	179.04	75.00%
DAP SPRAY-N-GO ALL COLORS	6.66	72.53%	0.00%	72.53%	0.00%	15.00%	0.009	3.000	100.00%	4.83	4.83	0.13	3.13	0.57	0.0541	32.20	75.00%
State Potential Emissions			**Add worst case coating to all solvents**									**51.9**	**1245**	**227.18**	**0.948**		

Control Technology Emissions (Combustion)																	
						Emission Factors							Emissions				
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO	
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0	
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0	
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0	
										Control Efficiency		Controlled	Controlled	Controlled	Controlled		
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate		
										0.000	**0.000**	per hour	per day	tons/yr	tons/yr		
Controlled Emissions due to Surface Coating Operations and Controls												**51.9**	**1245**	**227.2**	**0.948**		

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) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
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) * Flash-off
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) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Holly Park, Inc.
Plant Location: 51700 Lovejoy Drive, Middlebury, Indiana 46540
FESOP : F 039-9757
Plt ID: 039-00489
County: Elkhart
Permit Reviewer: Mark L Kramer
Date: May 8, 1998

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % MDI	Weight % Hexane	Weight % MEK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MDI Emissions (tons/yr)	Hexane Emissions (tons/yr)	MEK Emissions (tons/yr)
GV 3 - 12																
BPK 200 120440	7.29	0.083	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
INSTA-SHINE 458	8.00	0.080	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
FOAMSEAL F2100A	10.33	0.564	3.00	0.0001%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00	0.00	0.00	0.00004	0.00	0.00
FOAMSEAL F2100	8.66	0.580	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
SHEARWALL E-72 ADHESIVE 244683	9.00	1.872	3.00	100.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	22.14	0.00	0.00000	0.00	0.00
CLEANER & DEGREASER FCC002290	5.86	0.006	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
LAP CEMENT	8.15	3.099	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
MINERAL SPIRITS R10700	6.58	0.059	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
JOINT FILLER A30410	10.19	2.154	3.00	100.00%	4.10%	0.60%	0.90%	0.00%	0.00%	0.00%	11.82	1.73	2.60	0.00000	0.00	0.00
LATEX CAULK 73-931	11.83	0.165	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP QUICK SEAL 18001	12.06	0.033	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP SILICONE CAULK	8.52	0.081	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
ABS CEMENT 30889	7.08	0.054	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	75.00%	0.00	0.00	0.00	0.00000	0.00	3.77
#41 GREEN FLOOR SEALER 41-XX	8.60	0.090	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
SPREADMORE REBOND LATEX ADHESIVE 924	8.00	0.126	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
TANNER MB 46 XA-2675	9.50	3.788	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
GRUNDY'S SURFACE CEMENT	9.17	0.407	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
PERMATHANE SM7100	13.32	0.137	3.00	100.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.72	0.00	0.00000	0.00	0.00
STAYPUT IV SPRAY ADHESIVE	7.58	0.006	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
MANUS SEAL 27A	8.17	0.037	3.00	100.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.19	0.00	0.00	0.00000	0.00	0.00
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.019	3.00	0.0001%	0.00%	0.00%	0.00%	60.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
PVC CLEANER 30776	6.61	0.004	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	95.00%	0.00	0.00	0.00	0.00000	0.00	0.33
MAINTENANCE																
SAFETY YELLOW 70103HC	10.25	0.004	3.00	100.00%	15.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08	0.00	0.00	0.00000	0.00	0.00
CYCLO BRAKE & PARTS CLEANER C-32	12.00	0.027	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
CYCLO SILICONE SPRAY C-33	5.91	0.015	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	0.004	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	37.00%	0.00%	0.00	0.00	0.00	0.00000	0.13	0.00
CYCLO BRAKE AWAY C-10	7.46	0.005	3.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00000	0.00	0.00
DAP SPRAY-N-GO ALL COLORS 511XX	6.66	0.009	3.00	100.00%	5.00%	20.00%	0.00%	0.00%	0.00%	10.00%	0.04	0.16	0.00	0.00000	0.00	0.08

SUBTOTALS	(tons/yr):	13.14	24.75	2.60	0.00004	0.13	4.18
Total State Potential Emissions	(lbs/hr):	3.000	5.650	0.593	0.00001	0.030	0.954
	(g/sec):	0.378	0.712	0.075	0.00000	0.004	0.120

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

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Vinyl Acetate	Weight % Perchloro-ethylene	Weight % Trichloro-ethylene	Weight % Ethylene Glycol	Weight % Methylene-chloride	Weight % Dimethyla-cyclohex-lamine	Vinyl Acetate Emissions (tons/yr)	Perchloro-ethylene Emissions (tons/yr)	Trichloro-ethylene Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Methylene-chloride Emissions (tons/yr)	Dimethyla-cyclohex-lamine Emissions (tons/yr)	Total HAP Emissions (tons/yr)
GV 3 - 12																	
BPK 200 120440	7.29	0.083	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTA-SHINE 458	8.00	0.080	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FOAMSEAL F2100A	10.33	0.564	3.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FOAMSEAL F2100	8.66	0.580	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.66	0.66
SHEARWALL E-72 ADHESIVE 244683	9.00	1.872	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	22.14
CLEANER & DEGREASER FCC002290	5.86	0.006	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LAP CEMENT	8.15	3.099	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MINERAL SPIRITS R10700	6.58	0.059	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
JOINT FILLER A30410	10.19	2.154	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	16.15
LATEX CAULK 73-931	11.83	0.165	3.00	1.00	1.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.26	0.00	0.00	1.28	0.00	0.00	1.54
DAP QUICK SEAL 18001	12.06	0.033	3.00	1.00	0.50%	0.00%	0.00%	5.00%	0.00%	0.00%	0.03	0.00	0.00	0.26	0.00	0.00	0.29
DAP SILICONE CAULK	8.52	0.081	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS CEMENT 30889	7.08	0.054	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	3.77
#41 GREEN FLOOR SEALER 41-XX	8.60	0.090	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPREADMORE REBOND LATEX ADHESIVE 924	8.00	0.126	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TANNER MB 46 XA-2675	9.50	3.788	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GRUNDY'S SURFACE CEMENT	9.17	0.407	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PERMATHANE SM7100	13.32	0.137	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.72
STAYPUT IV SPRAY ADHESIVE	7.58	0.006	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MANUS SEAL 27A	8.17	0.037	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	1.19
ENERFOAM (DRYWALL ADHESIVE) ENER44	10.00	0.019	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PVC CLEANER 30776	6.61	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.33
MAINTENANCE																	
SAFETY YELLOW 70103HC	10.25	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.08
CYCLO BRAKE & PARTS CLEANER C-32	12.00	0.027	3.00	1.00	0.00%	45.00%	30.00%	0.00%	35.00%	0.00%	0.00	1.92	1.28	0.00	1.49	0.00	4.68
CYCLO SILICONE SPRAY C-33	5.91	0.015	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CYCLO WHITE GREASE W/ TEFLON C-34	6.66	0.004	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.13
CYCLO BRAKE AWAY C-10	7.46	0.005	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DAP SPRAY-N-GO ALL COLORS 511XX	6.66	0.009	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.28

					Lead Comp.	Lead
SAFETY YELLOW 70103HC	10.25	0.004	3.00	1.00	19.34%	0.104

Total State Potential Emissions

SUBTOTALS	**(tons/yr):**		**0.283**	**1.92**	**1.277**	**1.54**	**1.490**	**0.660**
	(lbs/hr):		**0.065**	**0.437**	**0.292**	**0.352**	**0.340**	**0.151**
	(g/sec):		**0.008**	**0.055**	**0.037**	**0.044**	**0.043**	**0.019**

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

TOTAL	(tons/yr):		52.1
	(lbs/hr):		**11.89**
	(g/sec):		**1.50**

BACT Cost Analysis

Facility Name: Holly Park, Inc.

Location: 51700 Lovejoy Drive, Middlebury, Indiana 46540

Permit No.: F 039-9757-00489

Permit Reviewer: MES

Capital Cost

Option	Base Price	Direct & Indirect Costs	Total
Regenerative Thermal Oxidizer	$4,578,750	$3,320,352	$7,899,102
Recuperative Thermal Oxidizer	$4,578,750	$3,320,352	$7,899,102
Zeolite Concentrator with Oxidizer	$4,937,112	$970,360	$5,907,472
Carbon Concentrator	$5,187,642	$3,107,884	$8,295,526
Material Substitution	$ 0	$ 0	$ 0
As-Installed	$ 0	$ 0	$ 0

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Regenerative Thermal Oxidizer	$2,547,356	n/a	$1,285,543	$3,832,899
Recuperative Thermal Oxidizer	$2,979,834	n/a	$1,285,543	$4,265,377
Zeolite Concentrator with Oxidizer	$ 686,760	n/a	$ 961,413	$1,648,173
Carbon Concentrator	$ 618,744	n/a	$1,363,249	$1,981,993
Material Substitution	$ 21,727	$ 0	$ 0	$ 21,727
As-Installed	$ 0	$ 0	$ 0	$ 0

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton removed
Regenerative Thermal Oxidizer	227.2	155.9	68.6	$24,586
Recuperative Thermal Oxidizer	227.2	155.9	68.6	$27,360
Zeolite Concentrator with Oxidizer	227.2	153.4	67.5	$10,744
Carbon Concentrator	227.2	151.1	66.5	$13,117
Material Substitution	227.2	8.5	0	$ 2,556
As-Installed	227.2	0	0	0

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.

c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).

b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 yrs life of the system at 10% interest rate).