NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP) for Winnebago of Indiana, LLC in Elkhart County

Significant Permit Revision No.: 039-43524-00444

The Indiana Department of Environmental Management (IDEM) has received an application from Winnebago of Indiana, LLC, located at 201 14th Street, Middlebury, Indiana 46540, for a significant revision of its FESOP Renewal issued on March 26, 2012. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Winnebago of Indiana, LLC to make certain changes at its existing source. Winnebago of Indiana, LLC has applied to modify the existing production lines. The modification includes an increased production capacity in the following recreational vehicle assembly lines: L13, L13 Repair, L3, L3 Repair, L6, and L6 Repair.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Middlebury Public Library
101 E. Winslow Street
Middlebury, IN 46540

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 039-43524-00444 in all correspondence.

Comments should be sent to:

Michaela Hecox  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031  
Or dial directly: (317) 233-3031  
Fax: (317) 232-6749 attn: Michaela Hecox  
E-mail: Mhecox@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, IDEM Northern Regional Office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Michaela Hecox of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Mr. Niall Geoghegan
Winnebago of Indiana, LLC
201 14th Street
Middlebury, IN 46540

Re: 039-43524-00444
Significant Revision to
F039-30646-00444

Dear Mr. Geoghegan:

Winnebago of Indiana, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F039-30646-00444, on March 26, 2012, for a stationary towable recreational vehicle manufacturing operation located at 201 14th Street, Middlebury, Indiana 46540. On December 1, 2020, the Office of Air Quality (OAQ) received an application from the source requesting to modify and increased production capacity in the following recreational vehicle assembly lines: L13, L13 Repair, L3, L3 Repair, L6, and L6 Repair. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

(a) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(b) Assembly Line Paint Repair, identified as L13 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(c) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(d) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(e) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(f) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.
control, and exhausting indoors.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

**Effective Date of the Permit**

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

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Michaela Hecox, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

Sincerely,

Brian Williams, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Elkhart County  
Elkhart County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northern Regional Office
Winnebago of Indiana, LLC  
201 14th Street,  
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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.

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.

<table>
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<td>Permits Branch</td>
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<td>Office of Air Quality</td>
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Significant Permit Revision No. 039-40307-00444, issued on November 19, 2018
Significant Permit Revision No. 039-42696-00444, issued on June 5, 2020

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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 towable recreational vehicle manufacturing operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>201 14th Street, Middlebury, Indiana 46540</th>
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<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>574-825-5220</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3792 (Travel Trailers and Campers)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
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<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
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<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
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A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(b) Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(c) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

(d) Assembly Line Paint Repair, identified as L13 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(e) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(f) Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(g) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

(h) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.
(i) One (1) metal/plastic panel Lamination Line located in building 5, identified as L2, constructed in 2018, using flow-coating application, with a maximum capacity of twenty-five panels per hour, using 1.5 gallons of coating per unit, uncontrolled, and exhausting through stack B5LSV.

(j) Two (2) wood cutting operations located in building 5, identified as B5-DC1 & B5-DC2, constructed in 2018, with a combined maximum process weight rate of 4,000 lbs of wood per hour, each controlled by an integral dust collector, identified as B5-DC1 and B5-DC2, respectively, exhausting through stack B5-DCSV1 & B5-DCSV2 respectively.

(k) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(l) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(m) One (1) woodworking operation, identified as B6DC, constructed in 2018, with a maximum process rate of 2,000 lbs of materials per hour, controlled by an integral dust collector, identified as B6DC, exhausting indoors through stack B6-DCSV1.

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) Two (2) stick welders with particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day per unit.

(b) Two (2) woodworking operations, identified as B3DC and B7DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per unit, consisting of:

1. One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.

2. One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, both controlled by a 5100 cubic feet per minute pulse-jet, return-air baghouse; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge Sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air Sanders, and five (5) hand drills, with combined maximum process weight rate of 1,104 pounds per hour.

(c) Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).

(d) One (1) flat wood panel lamination process (L1), using roller coating application, constructed in 2011, with a maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.
(e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

1. One (1) natural gas fired heater, identified as SB-023, with a maximum heat input rate of 0.4 MMBtu/hr.

2. One (1) natural gas fired heater, identified as SB-016, with a maximum heat input rate of 0.08 MMBtu/hr.

3. Six (6) natural gas fired heaters, identified as SB-017 through SB-022, each with a maximum heat input rate of 0.16 MMBtu/hr.

4. Five (5) natural gas fired heaters, identified as SV 25 through SV 29 and each with a maximum heat input rate of 0.4 MMBtu/hr.

5. Two (2) direct-fired Air Makeup heaters located in Building 5, identified as P5AM1 & P5AM2, each with a maximum heat input rate of 3.8 MMBtu/hr, exhausting through stacks P5AM1 and P5AM2.

6. Three (3) direct-fired Air Makeup Heaters located in Building 6, identified as P6AM1-3, each with a maximum heat input rate of 3.5 MMBtu/hr, exhausting through stacks P6AM1-3 respectively.

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 Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B    GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F039-30646-00444, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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; and

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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; and

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

If, due to circumstances beyond the Permittee’s control, the PMPs 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
B.12 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 describe the following:

1. An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
2. The permitted facility was at the time being properly operated;
3. During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
4. For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;
   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.
5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:
   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

   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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-30646-00444 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised, or

3. deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 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.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ 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, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 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, OAQ 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). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
(2) 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, OAQ on or before the date it is due.
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, OAQ 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “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 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at 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(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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, OAQ, or U.S. EPA is required.

(d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
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, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
B.21 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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, except particulate matter (PM), 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) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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.

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 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).

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

(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(c).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 14-10-1, 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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)]
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(b) Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(c) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

(d) Assembly Line Paint Repair, identified as L13 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(e) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(f) Hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(g) Hand application of mineral spirits for cleaning purposes plantwide, exhausting indoors.

(h) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(i) One (1) metal/plastic panel Lamination Line located in building 5, identified as L2, constructed in 2018, using flow-coating application, with a maximum capacity of twenty-five panels per hour, using 1.5 gallons of coating per unit, uncontrolled, and exhausting through stack B5LSV.

(k) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(l) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

Insignificant Activities:

(d) One (1) flat wood panel lamination process (L1), using roller coating application, constructed in 2011, maximum capacity of 330 lbs/hr of glue to wood panels, exhausting externally to stack vent L1SV1.

(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 New Facilities, General Reduction Requirements [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

(a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the glue stations;

(b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at the glue stations to limit overspray.

(c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from the glue station applicators during equipment cleanup.

Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;

(d) Limit total VOC input to each facility as follows:

(1) The total VOC input to the gluing operation (L13 and L3), including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input of sealants and adhesives (L13 and L3), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the following conditions shall apply:

The total volatile organic compounds (VOC) delivered, including glue, sealants, adhesives, solvents, and diluent usage, minus the VOC solvent shipped out, to the emission units listed below shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(1) Glue Operations at L13 and L3
(2) Sealant & Adhesive Usage at L13 and L3
(3) Cleaning Solvent Usage and Miscellaneous Clean Up Operations at L13 and L3
(4) L6 Assembly
(5) Lamination Processes (L1 & L2)
(6) Assembly Lines Paint Repair at L13, L3, and L6

Compliance with above condition will limit the source-wide VOC emissions including insignificant activities to less than 100 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) Compliance with the VOC limits in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed with 90 days of the issuance of this permit.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, "as supplied" or "as applied", or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed with 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC input limitations contained in D.1.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount of VOC in the waste shipped out for recycling or disposal, and adding it to the previous 11 months total VOC input, minus the amount of VOC in the waste shipped out for recycling or disposal, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.
(e) The VOC input for a month shall be calculated using the following equation:

\[ \text{VOC input} = SCL - SR \]

Where:

- \( SCL \) = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents and cleaning solvents, at the coating booths; and
- \( SR \) = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents and cleaning solvents, from the coating booths.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.1 and D.1.2 and to document the quantity of any VOC shipped offsite and deducted from the total reported VOC input. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

1. The VOC content of each coating material and solvent used.

2. The amount of coating material and solvent used on a monthly basis. Records shall include purchase order, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used.

3. If the amount of VOC in waste material is being deducted from the VOC input as allowed in Paragraph B of Condition D.1.4, then the following records shall be maintained:
   
   A. The amount of VOC containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
   
   B. The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
   
   C. The weight of the VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

4. The total VOC input, including coatings, dilution solvents, and cleaning solvents, for each month and each compliance period.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an authorized individual as defined by 326 IAC 2-1.1-1(1).
### SECTION D.2 FACILITY OPERATION CONDITIONS

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

| (j) | Two (2) wood cutting operations located in building 5, identified as B5-DC1 & B5-DC2, constructed in 2018, with a combined maximum process weight rate of 4,000 lbs of wood per hour, each controlled by an integral dust collector, identified as B5-DC1 and B5-DC2, respectively, exhausting through stack B5-DCSV1 & B5-DCSV2 respectively. |
| (m) | One (1) woodworking operation, identified as B6DC, constructed in 2018, with a maximum process rate of 2,000 lbs of materials per hour, controlled by an integral dust collector, identified as B6DC, exhausting indoors through stack B6-DCSV1. |

#### Insignificant Activities:

- **(a)** Two (2) stick welders with particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day per unit.
- **(b)** Two (2) woodworking operations, identified as B3DC and B7DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per unit, consisting of:
  1. One (1) Cut off saw, one (1) 10" Chop saw, one (1) Table saw, one (1) Edge Sander and one (1) 7' x 7' Panel saw, with combined maximum process weight rate of 445 pounds per hour and each exhausting through a baghouse inside the building.
  2. One (1) pin router, table saw and panel saw, each with particulate matter controlled by a portable dust collector, one (1) cutoff saw and nine (9) hand router systems, both controlled by a 5100 cubic feet per minute pulse-jet, return-air baghouse; three (3) cut off saws, three (3) band saws, eight (8) chop saws, one (1) table saw, two (2) edge sanders, one (1) bench grinder, two (2) hand buffers, one (1) drill press, one (1) mitre saw, twenty-five (25) portable hand held routers, five (5) hand held air sanders, and five (5) hand drills, with combined maximum process weight rate of 1,104 pounds per hour.
- **(c)** Usage of materials with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day. (Glass primer, glass cleaner, dry lubricant, silicone lubricant, and lacquer thinner).
- **(e)** The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(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 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**
  A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

- **D.2.2 Particulate Control [326 IAC 6-3-2]**
  In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Woodworking Operations, identified as B3DC, B7DC, and B6DC, the baghouses for particulate control shall be in operation and control emissions from the associated
woodworking processes at all times the woodworking processes are in operation.

(b) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Cutting Operations, identified as B5-DC1 and B5-DC2, the baghouse and cyclone for particulate control shall be in operation and control emissions from the associated milling processes at all times the milling processes are in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of the baghouses and dust collector associated with the wood working and cutting operations, B3DC, B7DC, B6DC, B5-DC1, B5-DC2, when venting to the atmosphere. A baghouse and dust collector inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.2.4 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.3.

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, Indiana 46540
FESOP Permit No.: F039-30646-00444

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:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)______________________________________________________
☐ Report (specify)_________________________________________________________
☐ Notification (specify)_____________________________________________________
☐ Affidavit (specify)_______________________________________________________
☐ 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: ____________________________________________________________________
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

EMERGENCY OCCURRENCE REPORT

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, Indiana 46540
FESOP Permit No.: F039-30646-00444

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours
    (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days
    (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date/Time Emergency started:</strong></td>
</tr>
<tr>
<td><strong>Date/Time Emergency was corrected:</strong></td>
</tr>
<tr>
<td><strong>Was the facility being properly operated at the time of the emergency?</strong> Y N</td>
</tr>
<tr>
<td><strong>Describe:</strong></td>
</tr>
<tr>
<td><strong>Type of Pollutants Emitted:</strong> TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td><strong>Estimated amount of pollutant(s) emitted during emergency:</strong></td>
</tr>
<tr>
<td><strong>Describe the steps taken to mitigate the problem:</strong></td>
</tr>
<tr>
<td><strong>Describe the corrective actions/response steps taken:</strong></td>
</tr>
<tr>
<td><strong>Describe the measures taken to minimize emissions:</strong></td>
</tr>
<tr>
<td><strong>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:</strong></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-30646-00444
Facility: L13 and L3 Glue Operation
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 28.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: ________________ YEAR: ________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
<th>VOC Shipped Out</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviations have been reported on: ________________

Submitted by: __________________________
Title / Position: __________________________
Signature: __________________________
Date: __________________________
Phone: __________________________
FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-30646-00444
Facility: L13 and L3 Sealant & Adhesive Usage
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 29.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Year: ____________________________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
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</tr>
</tbody>
</table>

- No deviation occurred in this quarter.
- 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 QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC  
Source Address: 201 14th Street, Middlebury, IN 46540  
FESOP No.: 039-30646-00444  
Facility: Glue Operations at L13 and L3  
Sealant & Adhesive Usage at L13 and L3  
Cleaning Solvent Usage and Miscellaneous Clean Up Operations at L13 and L3  
L6 Assembly  
Lamination Processes (L1 & L2)  
Assembly Lines Paint Repair at L13, L3, and L6  
Parameter: VOC input usage  
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ 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 QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

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

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, Indiana 46540
FESOP Permit No.: F039-30646-00444

<table>
<thead>
<tr>
<th>Month Range</th>
<th>Year</th>
</tr>
</thead>
</table>

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No Deviations Occurred this Reporting Period”.

- NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
<th>Number of Deviations</th>
<th>Probable Cause of Deviation</th>
<th>Response Steps Taken</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
<th>Number of Deviations</th>
<th>Probable Cause of Deviation</th>
<th>Response Steps Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit Requirement</td>
<td>Date of Deviation</td>
<td>Duration of Deviation</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Deviations</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Deviations</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Winnebago of Indiana, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>201 14th Street, Middlebury, IN 46540</td>
</tr>
<tr>
<td>County:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3792 (Travel Trailers and Campers)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>F 039-30646-00444</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>March 26, 2012</td>
</tr>
<tr>
<td>Significant Permit Revision No.:</td>
<td>039-43524-00444</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Michaela Hecox</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued FESOP Renewal No. 039-30646-00444 on March 26, 2012. The source has since received the following approvals:

(a) FESOP SPR No. 039-40307-00444, issued on November 19, 2018; and
(b) FESOP SPR No. 039-42696-00444, issued on June 5, 2020.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Elkhart County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>1.03</td>
<td>1.56</td>
<td>1.56</td>
<td>0.06</td>
<td>9.25</td>
<td>98.31</td>
<td>7.77</td>
<td>9.5</td>
<td>24.68</td>
</tr>
</tbody>
</table>
### Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM$^1$</th>
<th>PM$_{10}^3$</th>
<th>PM$_{2.5}^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a “regulated air pollutant.”

2. PM$_{2.5}$ listed is direct PM$_{2.5}$.

3. Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP SPR No. 039-42696-00444, issued on June 5, 2020.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Winnebago of Indiana, LLC on December 1, 2020, relating to the modification of the existing production lines. The modification includes an increased production capacity in the following recreational vehicle assembly lines: L13, L13 Repair, L3, L3 Repair, L6, and L6 Repair.

The following is a list of the modified emission units and pollution control device(s):

(a) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(b) Assembly Line Paint Repair, identified as L13 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(c) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(d) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.
(e) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(f) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Permit Level Determination – FESOP Significant Permit Revision**

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP ^{2}</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTE Before Modification (L13 Assembly)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>55.44</td>
<td>-</td>
<td>9.82</td>
<td>23.41</td>
</tr>
<tr>
<td>PTE After Modification (L13 Assembly)</td>
<td>0.68</td>
<td>0.68</td>
<td>0.68</td>
<td>-</td>
<td>-</td>
<td>23.83</td>
<td>-</td>
<td>0.52</td>
<td>1.11</td>
</tr>
<tr>
<td>PTE Increase (L13 Assembly)</td>
<td>0.68</td>
<td>0.068</td>
<td>0.68</td>
<td>-</td>
<td>-</td>
<td>0.00</td>
<td>-</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PTE Before Modification (L13 Repair)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>0.13</td>
<td>-</td>
<td>0.02</td>
<td>0.05</td>
</tr>
<tr>
<td>PTE After Modification (L13 Repair)</td>
<td>0.04</td>
<td>0.04</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
<td>0.22</td>
<td>-</td>
<td>0.05</td>
<td>0.09</td>
</tr>
<tr>
<td>PTE Increase (L13 Repair)</td>
<td>0.03</td>
<td>0.03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>0.09</td>
<td>-</td>
<td>0.03</td>
<td>0.04</td>
</tr>
<tr>
<td>PTE Before Modification (L3 Assembly)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>55.44</td>
<td>-</td>
<td>9.82</td>
<td>23.41</td>
</tr>
<tr>
<td>PTE After Modification (L3 Assembly)</td>
<td>1.81</td>
<td>1.81</td>
<td>1.81</td>
<td>-</td>
<td>-</td>
<td>70.47</td>
<td>-</td>
<td>1.33</td>
<td>3.34</td>
</tr>
</tbody>
</table>
Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves a change in operation, where the potential to emit of any pollutant increases as indicated below with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

(i) Volatile Organic Compounds (VOC).

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$$^1$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PTE Increase (L3 Assembly)</strong></td>
<td>1.81</td>
<td>1.81</td>
<td>1.81</td>
<td>-</td>
<td>-</td>
<td>15.03</td>
<td>-</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>PTE Before Modification (L3 Repair)</strong></td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>0.13</td>
<td>-</td>
<td>0.02</td>
<td>0.05</td>
</tr>
<tr>
<td><strong>PTE After Modification (L3 Repair)</strong></td>
<td>0.04</td>
<td>0.04</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
<td>0.22</td>
<td>-</td>
<td>0.05</td>
<td>0.09</td>
</tr>
<tr>
<td><strong>PTE Increase (L3 Repair)</strong></td>
<td>0.03</td>
<td>0.03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>0.09</td>
<td>-</td>
<td>0.03</td>
<td>0.04</td>
</tr>
<tr>
<td><strong>PTE Before Modification (L6 Assembly)</strong></td>
<td>0.02</td>
<td>0.02</td>
<td>0.02</td>
<td>-</td>
<td>-</td>
<td>0.13</td>
<td>-</td>
<td>2.31</td>
<td>7.24</td>
</tr>
<tr>
<td><strong>PTE After Modification (L6 Assembly)</strong></td>
<td>0.68</td>
<td>0.68</td>
<td>0.68</td>
<td>-</td>
<td>-</td>
<td>23.83</td>
<td>-</td>
<td>0.52</td>
<td>1.11</td>
</tr>
<tr>
<td><strong>PTE Increase (L6 Assembly)</strong></td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>23.70</td>
<td>-</td>
<td>0.00</td>
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</tr>
<tr>
<td><strong>PTE Before Modification (L6 Repair)</strong></td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>1.20E-07</td>
<td>-</td>
<td>0.02</td>
<td>0.05</td>
</tr>
<tr>
<td><strong>PTE After Modification (L6 Repair)</strong></td>
<td>0.04</td>
<td>0.04</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
<td>0.22</td>
<td>-</td>
<td>0.05</td>
<td>0.09</td>
</tr>
<tr>
<td><strong>PTE Increase (L6 Repair)</strong></td>
<td>0.03</td>
<td>0.03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>0.22</td>
<td>-</td>
<td>0.03</td>
<td>0.04</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the Modified Emission Unit(s)/Process</strong></td>
<td>3.22</td>
<td>3.22</td>
<td>3.22</td>
<td>0.00</td>
<td>0.00</td>
<td>39.13</td>
<td>0.00</td>
<td>0.09</td>
<td>0.11</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.
### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM(^1)</th>
<th>PM(_{10})(^1)</th>
<th>PM(_{2.5})(^{1,2})</th>
<th>SO(_2)</th>
<th>NO(_X)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire</strong></td>
<td>4.25</td>
<td>4.78</td>
<td>4.78</td>
<td>0.06</td>
<td>9.25</td>
<td>98.31</td>
<td>7.77</td>
<td>2.36</td>
<td>5.99</td>
</tr>
<tr>
<td>Source Excluding</td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td><strong>Fugitives</strong></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Title V Major Source</strong></td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td><strong>Thresholds</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td><strong>PSD Major Source</strong></td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
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</tr>
<tr>
<td><strong>Thresholds</strong></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Emission Offset Major</strong></td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Source Thresholds</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^3\)Single highest source-wide HAP is MDI.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source will continue to take VOC limits in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section and 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

Due to the proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit since this source does not coat metal furniture.

(b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations 40 CFR 60.390, Subpart MM, are not included in this revision for the Assembly 6 because this facility manufactures recreational vehicles, which do not meet the definition of an automobile or light duty truck.

(c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12),
are not included in the permit, since this source does not coat plastic parts for business machines.

(d) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63, Subpart IIII), Surface Coating of Automobiles and Light Duty Trucks, because the source does not meet the definition of an automobile or light duty truck surface coating operation. This source operates a stationary towable recreational vehicle manufacturing operation with gross vehicle weight rating of greater than 8,500 pounds. Therefore, Subpart IIII does not apply and the requirements of the NESHAP are not included in the permit.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM)(326 IAC 20-80) are not included in the permit, because the source does not coat metal parts or products and is not a major source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Large Appliances (40 CFR 63, Subpart NNNN)(326 IAC 20-63) are not included in the permit, because the source does not coat large appliances and is not a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP)(326 IAC 20-81) are not included in the permit, because the source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit, since the source does not coat metal furniture at this facility.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63.11414, Subpart OOOOOO, are not included in the permit, since this source does not produce or fabricate flexible polyurethane or rebond foam.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH, are not included in the permit for all of the source. The requirements of this NESHAP apply to an area source of HAPs which is involved in any of the following activities:

1. Performs Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes.

2. Performs spray coatings (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for autobody refinishing and mobile equipment.

3. Performs spray coatings (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for any part or product made of metal or plastic, or combinations of metal and plastic.

The source does not perform any paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes. The source performs metal coating (miscellaneous coating) operations,
however the source does not use any coatings that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

The source submitted an initial notification and a petition for exemption on January 3, 2011 to U.S. EPA with a copy to IDEM. This petition was submitted because there is no paint stripping operations which use methylene chloride at the source and none of the coatings used contain compounds of chromium, lead, manganese, nickel or cadmium.

On March 11, 2013, the U.S. EPA made the determination that the source does not perform "spray applied coating operations" as defined in 40 CFR 63.11180. Based on the information provided by the source, no coatings containing target HAPs are applied using spray application methods and aerosol spray methods are not considered spray coating. The source uses manual and aerosol application methods on Assembly 3, 4, and 6. Therefore, Assembly 3 and 4 are no longer subject to this NESHAP, and P6 Assembly is not subject to this NESHAP.

(h) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)</strong></td>
</tr>
<tr>
<td>PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.</td>
</tr>
<tr>
<td><strong>326 IAC 2-6 (Emission Reporting)</strong></td>
</tr>
<tr>
<td>This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.</td>
</tr>
<tr>
<td><strong>326 IAC 2-8-4 (FESOP)</strong></td>
</tr>
<tr>
<td>FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.</td>
</tr>
</tbody>
</table>

**FESOP VOC Limit(s)**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall continue to comply with the following:

(a) The total volatile organic compounds (VOC) delivered, including glue, sealants, adhesives, solvents, and diluent usage, minus the VOC solvent shipped out, to the emission units listed below shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(1) Glue Operations at L13 and L3
(2) Sealant & Adhesive Usage at L13 and L3
(3) Cleaning Solvent Usage and Miscellaneous Clean Up Operations at L13 and L3
(4) L6 Assembly
(5) Lamination Processes (L1 & L2)
(6) Assembly Lines Paint Repair at L13, L3, and L6
Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Due to the revision, the source has requested to modify production capacity of existing lines and continue to have the lines take the existing VOC limit.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

Due to this revision, the operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 5-1 (Opacity Limitations)**

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

1. 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.

2. 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.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

### State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

**L13 Assembly Line and Repair Line**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

(a) Pursuant to 326 IAC 6-3-1(b)(5)-(8), surface coating using dip, roll, flow, or brush coating is exempt from the requirements of 326 IAC 6-3-2. Therefore, any surface coating using these methods in the L13 assembly line and the L13 repair line are not subject to the requirements of 326 IAC 6-3-2.

(b) Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3-2. Therefore, the L13 assembly line and the L13 repair line are not subject to the requirements of 326 IAC 6-3-2.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

L13 assembly line and L13 repair line are still subject to the requirements of 326 IAC 8-1-6, because they were constructed after January 1, 1980, and their unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, and the L13 assembly line and L13 repair line are not regulated by other rules in 326 IAC 8. The following Best Available Control Technology (BACT) analysis was required for the L13 assembly line and L13 repair line and has not changed.
(a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency) application equipment for adhesives application at the glue stations;

(b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at the glue stations to limit overspray.

(c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from the glue station applicators during equipment cleanup.

Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;

(d) Limit total VOC input to each facility as follows:

(1) The total VOC input to the gluing operation (L13 and L3), including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input of sealants and adhesives (L13 and L3), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a), 326 IAC 8-2-9(a), and 326 IAC 8-2-9(b), L13 assembly line and L13 repair line are not subject to the requirements of 326 IAC 8-2-9 because they have actual VOC emissions less than 15 pounds per day when applying materials to metal substrates.

L3 Assembly Line and Repair Line

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(a) Pursuant to 326 IAC 6-3-1(b)(5)-(8), surface coating using dip, roll, flow, or brush coating is exempt from the requirements of 326 IAC 6-3-2. Therefore, any surface coating using these methods in the L3 assembly line and the L3 repair line are not subject to the requirements of 326 IAC 6-3-2.

(b) Pursuant to 326 IAC 6-3-1(b)(6), applications of aerosol coating products to repair minor surface damage and imperfections are exempt from the requirements of 326 IAC 6-3-2. Therefore, all aerosol applications at L3 assembly line are not subject to the requirements of 326 IAC 6-3-2.

(c) Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3-2. Therefore, the L3 Repair Line is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
L3 assembly line and L3 repair line are still subject to the requirements of 326 IAC 8-1-6, because they were constructed after January 1, 1980, and their unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, and the L3 assembly line and L3 repair line are not regulated by other rules in 326 IAC 8. The following Best Available Control Technology (BACT) analysis was required for the L3 assembly line and L3 repair line and has not changed.

(a) Utilize air atomized spray or more environmentally beneficial (better solid transfer efficiency)
application equipment for adhesives application at the glue stations;

(b) Conduct training and instruction of operators in the most effective work practices for controlling placement of the sealants and adhesives to minimize material usage, including correct positioning of applicator nozzles when applying adhesives at the glue stations to limit overspray.

(c) Perform proper equipment clean-up and maintenance, including containment of solvent sprayed from the glue station applicators during equipment cleanup.

Such containers shall be closed as soon as cleanup is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation;

(d) Limit total VOC input to each facility as follows:

(1) The total VOC input to the gluing operation (L13 and L3), including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input of sealants and adhesives (L13 and L3), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The equipment and work practice standards listed in (a) through (d) shall be used at all times of facility operations.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a), 326 IAC 8-2-9(a), and 326 IAC 8-2-9(b), L3 assembly line and L3 repair line are not subject to the requirements of 326 IAC 8-2-9 because they have actual VOC emissions less than 15 pounds per day when applying materials to metal substrates.

L6 Assembly Line and Repair Line

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-1(b)(5)-(8), surface coating using dip, roll, flow, or brush coating is exempt from the requirements of 326 IAC 6-3-2. Therefore, any surface coating using these methods in the L6 assembly line and the L6 repair line are not subject to the requirements of 326 IAC 6-3-2.

(b) Pursuant to 326 IAC 6-3-1(b)(6), applications of aerosol coating products to repair minor surface damage and imperfections are exempt from the requirements of 326 IAC 6-3-2. Therefore, all aerosol applications at L6 assembly line are not subject to the requirements of 326 IAC 6-3-2.

(c) Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3-2. Therefore, the L6 repair line is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, L6 assembly line and L6 repair lines were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a), 326 IAC 8-2-9(a), and 326 IAC 8-2-9(b), L6 assembly line and L6 repair line are not subject to the requirements of 326 IAC 8-2-9 because they have actual VOC emissions less than 15 pounds per day when applying materials to metal substrates.
Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this revision.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) Condition A.2, A.3, D.1 and D.2 have been modified to update the emission unit descriptions.

(2) The FESOP Quarterly Reports have been modified to update the emission unit descriptions.

(3) Single HAP and Total HAP limits have been removed from the permit.

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

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

Building 3

(a) Building 3 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside the building.

(b) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(c) Building 3 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(d) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

Building 4

(e) Building 4 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside the building.

(f) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(g) Building 4 hand application of mineral spirits for cleaning purposes plantwide,
exhausting *indoors* inside the building.

**NOTE:** The source-wide capacity of the Building 3 and Building 4 production lines is 2.4 units per hour combined.

(h) Building 4 Assembly Line Paint Repair, identified as P4 PR, approved in 2020 for construction, with a maximum capacity of 0.25 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(h) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

**Building 5**

(i) One (1) metal/plastic panel Lamination Line located in building 5, identified as L2, constructed **in 2018** approved in 2018 for construction, using flow-coating application, with a maximum capacity of twenty-five panels per hour, using 1.5 gallons of coating per unit, uncontrolled, and exhausting through stack P5LSV.

(j) Two (2) wood cutting operations located in building 5, identified as BP5-DC1 & BP5-DC2, constructed **in 2018** approved in 2018 for construction, with a combined maximum process weight rate of 4,000 lbs of wood per hour, each controlled by an integral dust collector, identified as BP5-DC1 and BP5-DC2, respectively, exhausting through indoors through stack BP5-DCSV1 & BP5-DCSV2 respectively.

**Building 6**

(k) Building 6 fabrication consisting of one (1) assembly line, identified as P6 Assembly, approved for construction in 2018, including manual, flow, and airless application of miscellaneous adhesives, sealants, and cleaners during production, with a maximum capacity of 0.5 RVs per hour, and 60.78 gallons of adhesive per day, uncontrolled, and exhausting indoors.

(k) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(l) Building 6 Assembly Line Paint Repair, identified as P6 PR, approved in 2020 for construction, with a maximum capacity of 0.25 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(l) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(m) One (1) woodworking operation, identified as BP6DC, constructed **in 2018** approved for construction in 2018, with a maximum process rate of 2,000 lbs of materials per hour, controlled by an integral dust collector, identified as BP6DC, exhausting indoors through stack B5-B6-DCSV1.

**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):

... 

(b) Two (2) woodworking operations, identified as B3DC and B7DC identified as P3DC and P4DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per unit, consisting of:
SECTION D.1 FACILITY OPERATION CONDITIONS

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

Building 3

(a) Building 3 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside of the building.

(b) One (1) recreational vehicle assembly line, identified as L13, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(c) Building 3 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(d) Hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

Building 4

(e) Building 4 fabrication consisting of four (4) glue stations, constructed in 1992, cumulatively rated at 1.26 gallons of adhesive per hour, with each station utilizing an airless spray application method, no control and exhausting inside the building.

(f) One (1) recreational vehicle assembly line, identified as L3, constructed in 1992, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 4.5 recreational vehicles per hour, and exhausting indoors.

(g) Building 4 hand application of miscellaneous sealants and adhesives during product carpeting, paneling and plastic pipe, linoleum and roof installation, no control and exhausting indoors.

(h) Building 4 hand application of mineral spirits for cleaning purposes plant-wide, exhausting indoors.

NOTE: The source-wide capacity of the Building 3 and Building 4 production lines is 2.4 units per hour combined.

(h) Building 4 Assembly Line Paint Repair, identified as P4 PR, approved in 2020 for construction, with a maximum capacity of 0.25 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(i) Assembly Line Paint Repair, identified as L3 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.
Building 5

(i) One (1) metal/plastic panel Lamination Line located in building 5, identified as L2, constructed in 2018, approved in 2018 for construction, using flow-coating application, with a maximum capacity of twenty-five panels per hour, using 1.5 gallons of coating per unit, uncontrolled, and exhausting through stack P5LSV.

Building 6

(k) Building 6 fabrication consisting of one (1) assembly line, identified as P6 Assembly, approved for construction in 2018, including manual, flow, and airless application of miscellaneous adhesives, sealants, and cleaners during production, with a maximum capacity of 0.5 RVs per hour, and 60.78 gallons of adhesive per day, uncontrolled, and exhausting indoors.

(k) One (1) recreational vehicle assembly line, identified as L6, constructed in 2019, approved for modification in 2021, consisting of adhesive application, solvent wiping, caulking, and touch-up paint operations, with a maximum capacity of 2.0 recreational vehicles per hour, and exhausting indoors.

(l) Building 6 Assembly Line Paint Repair, identified as P6 PR, approved in 2020 for construction, with a maximum capacity of 0.25 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(l) Assembly Line Paint Repair, identified L6 Repair, constructed in 2020, approved for modification in 2021, with a maximum capacity of 0.50 units per hour, utilizing a HVLP spray gun, using no control, and exhausting indoors.

(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 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) is as follows:

(d) Limit total VOC input to each facility as follows:

(1) The total VOC input to the gluing operation (Building 3 and Building 4), including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input to the plant-wide usage of sealants and adhesives (Building 3 and Building 4), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) The total VOC input to the gluing operation (L13 and L3), including solvent and diluent usage, minus the VOC solvent shipped out, shall be limited to less than 28.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The total volatile organic compounds (VOC) input of sealants and adhesives (L13 and L3), shall be limited to less than 29.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the following conditions shall apply:

(a) The total volatile organic compounds (VOC) delivered, including glue, sealants, adhesives, solvents, and diluent usage, minus the VOC solvent shipped out, to the emission units listed below shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

1. Glue Operations in Building 3 and Building 4
2. Sealant & Adhesive Usage in Building 3 and Building 4
3. Cleaning Solvent Usage and Miscellaneous Clean Up Operations in Buildings 3 and 4
4. P6 Assembly
5. Lamination Processes (L1 & L2)
6. Assembly Lines Paint Repair in Building 3, Building 4, and Building 6

(b) The amount of single and total HAPs delivered, including glue, sealants, adhesives, solvents, and diluent usage, to the emission units listed below shall be limited such that the source-wide single HAP and total HAPs emissions shall not exceed 9.50 and 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

1. Glue Operations in Building 3 and Building 4
2. Sealant & Adhesive Usage in Building 3 and Building 4
3. Cleaning Solvent Usage and Miscellaneous Clean Up Operations in Building 3 and 4
4. P6 Assembly
5. Lamination Processes (L1 & L2)
6. Assembly Lines Paint Repair in Building 3, Building 4, and Building 6

Compliance with above conditions will limit the source-wide VOC, single HAP, and total HAPs emissions including insignificant activities to less than 100, 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 40 CFR Part 63 (Subpart PPPP) do not apply.

D.1.3 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when coating metal for P6 Assembly.


Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials for P6 Assembly. Work practices shall include, but not be limited to, the following:
(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) Compliance with the VOC and HAP limits in Conditions D.1.1 and D.1.2 Conditions D.1.1, D.1.2, D.1.3, and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis for each individual line. This volume weighted average shall be determined by the following equation:

\[ A = \frac{\sum (C \times U)}{\sum U} \]

Where:

\( A \) = the volume weighted average in pounds VOC per gallon less water as applied;

\( C \) = the VOC content of the coating in pounds VOC per gallon less water as applied; and

\( U \) = the usage rate of the coating in gallons per day.

The Permittee is not required to determine volume weighted average of coatings for a given day, if only compliant coatings are used on that day.

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

D.1.85 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1)
through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Condition D.1.1 and D.1.2 and to document the quantity of any VOC shipped offsite and deducted from the total reported VOC input. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used.

... 

(4) The total VOC, total single HAP, and combined HAP input, including coatings, dilution solvents, and cleaning solvents, for each month and each compliance period.

(b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.3.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of each coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The VOC content of each coating less water as applied.

(3) The volume weighted average VOC content less water of the coatings used for each day. The Permittee is not required to maintain a record of volume weighted average VOC content of the coatings for a given day, if only compliant coatings are used on that day.

(eb) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition

... 

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Building 5

(i) Two (2) wood cutting operations located in building 5, identified as P5-DC1 & P5-DC2, approved in 2018 for construction, with a combined maximum process weight rate of 4,000 lbs of wood per hour, each controlled by an integral dust collector, identified as P5-DC1 and P5-DC2, respectively, exhausting through stack P5-DCSV1 & P5-DCSV2 respectively.

(j) Two (2) wood cutting operations located in building 5, identified as B5-DC1 & B5-DC2, constructed in 2018, with a combined maximum process weight rate of 4,000 lbs of wood per hour, each controlled by an integral dust collector, identified as B5-DC1 and B5-DC2, respectively, exhausting through stack B5-DCSV1 & B5-DCSV2 respectively.
Building 6

(m) One (1) woodworking operation, identified as P6DC, approved for construction in 2018, with a maximum process rate of 2,000 lbs of materials per hour, controlled by an integral dust collector, identified as P6DC, exhausting through stack P6-DCSV1.

(m) One (1) woodworking operation, identified as B6DC, constructed in 2018, with a maximum process rate of 2,000 lbs of materials per hour, controlled by an integral dust collector, identified as B6DC, exhausting indoors through stack B6-DCSV1.

Insignificant Activities:

(b) Two (2) woodworking operations, identified as P3DC and P4DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per unit, consisting of:

(b) Two (2) woodworking operations, identified as B3DC and B7DC, each with particulate emissions less than five (5) pounds per hour or twenty-five (25) pound per day per unit, consisting of:

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.2 Particulate Control [326 IAC 6-3-2]

(a) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Woodworking Operations, identified as P3DC, P4DC, and P6DC, the baghouses for particulate control shall be in operation and control emissions from the associated woodworking processes at all times the woodworking processes are in operation.

(b) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Cutting Operations, identified as P5-DC1 and P5-DC2, the baghouse and cyclone for particulate control shall be in operation and control emissions from the associated milling processes at all times the milling processes are in operation.

(a) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Woodworking Operations, identified as B3DC, B7DC, and B6DC, the baghouses for particulate control shall be in operation and control emissions from the associated woodworking processes at all times the woodworking processes are in operation.

(b) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Cutting Operations, identified as B5-DC1 and B5-DC2, the baghouse and cyclone for particulate control shall be in operation and control emissions from the associated milling processes at all times the milling processes are in operation.

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

D.2.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of the baghouses and dust collector associated with the wood working and cutting operations, B3DC, B7DC, B6DC, B5-DC1, B5-DC2, P3DC, P4DC, P6DC, P5-DC1, P5-DC2, when venting to the atmosphere. A baghouse and dust collector inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Winnebago of Indiana, LLC
Source Address: 201 14th Street, Middlebury, IN 46540
FESOP No.: 039-30646-00444
Facility: L13 and L3 Glue Operation
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 28.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...
Parameter: VOC input usage
Limit: The total VOC input to these units shall be limited such that the VOC emissions from these operations shall not exceed 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

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<td>Building 3, Building 4, and Building 6 Assembly Line Paint Repair</td>
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Parameter: Single HAP and Total HAPs input usage
Limit: The amount of single and total HAPs input to the above units shall be limited such that the emissions from these operations for each single HAP and total HAPs emissions shall not exceed 9.5 and 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

QUARTER: __________ YEAR: __________________

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- [ ] No deviation occurred in this quarter.
- [ ] Deviation/s occurred in this quarter.
  Deviation has been reported on: __________________________

Submitted by: __________________________
Title / Position: __________________________

Winnebago of Indiana, LLC
Middlebury, Indiana
Permit Reviewer: Michaela Hecox
Additional Changes

IDEM, OAQ has made no additional changes to the permit.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 1, 2020.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 039-43524-00444. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Michaela Hecox, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Emissions Summary

**Company Name:** Winnebago of Indiana, LLC  
**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**FESOP SPR:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

#### Unrestricted Potential Emissions

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*Highest Single HAP ≠ MDI  
*Emissions after integral control device  
Shaded cells indicate where limits exist

#### Limited Potential to Emit

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*Highest Single HAP ≠ MDI  
*Emissions after integral control device  
Shaded cells indicate where limits exist

### Emission Units
- PM
- PM10
- PM2.5
- SO₂
- NOx
- VOC
- CO
- Single HAP
- Total HAP
### Appendix A: Emissions Calculations

#### Emissions Summary

**Company Name:** Winnebago of Indiana, LLC  
**Address City In Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**FESOP SPR:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

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<th>Xylene</th>
<th>Hexane</th>
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#### Emissions by HAP

- **L13 Assembly**:  
  - Ethyl: 0.01  
  - Benzene: 0.00  
  - Ethylene: 0.08  
  - Cumene: 0.05  
  - Styrene: 0.02  
  - Methanol: 0.12  
  - Toluene: 0.06  
  - Xylene: 0.15  
  - Hexane: 0.01  
  - Benzene: 0.52  
  - Dichlorobenzene: 0.05  
  - Formaldehyde: 6.57E-04  
  - Lead: 0.04  
  - Cadmium: 0.52  
  - Chromium: 1.11  

- **L13 Repair**:  
  - Ethyl: 0.01  
  - Benzene: 0.00  
  - Ethylene: 0.00  
  - Cumene: 1.63E-03  
  - Styrene: 0.01  
  - Methanol: 1.43E-02  
  - Toluene: 0.05  
  - Xylene: 2.38E-04  
  - Hexane: 0.01  
  - Benzene: 0.05  
  - Dichlorobenzene: 0.00  

- **L3 Assembly**:  
  - Ethyl: 0.02  
  - Benzene: 0.00  
  - Ethylene: 0.06  
  - Cumene: 0.31  
  - Styrene: 0.07  
  - Methanol: 3.44E-01  
  - Toluene: 0.10  
  - Xylene: 0.03  
  - Hexane: 1.26E-03  
  - Benzene: 1.33  
  - Dichlorobenzene: 0.02  
  - Formaldehyde: 1.48E-03  

- **L3 Repair**:  
  - Ethyl: 0.01  
  - Benzene: 0.00  
  - Ethylene: 0.00  
  - Cumene: 0.01  
  - Styrene: 0.01  
  - Methanol: 0.01  
  - Toluene: 0.05  
  - Xylene: 2.38E-04  
  - Hexane: 0.01  
  - Benzene: 0.05 

- **L6 Assembly**:  
  - Ethyl: 0.01  
  - Benzene: 0.00  
  - Ethylene: 0.08  
  - Cumene: 0.05  
  - Styrene: 0.02  
  - Methanol: 1.18E-01  
  - Toluene: 0.06  
  - Xylene: 0.15  
  - Hexane: 0.01  
  - Benzene: 0.52  
  - Dichlorobenzene: 0.05  
  - Formaldehyde: 0.05  

- **L6 Repair**:  
  - Ethyl: 0.01  
  - Benzene: 0.00  
  - Ethylene: 0.00  
  - Cumene: 1.63E-03  
  - Styrene: 0.01  
  - Methanol: 1.43E-02  
  - Toluene: 0.05  
  - Xylene: 2.38E-04  
  - Hexane: 0.01  
  - Benzene: 0.05
Appendix A: Emissions Calculations
Revision Summary

**Company Name:** Winnebago of Indiana, LLC  
**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**FESOP SPR:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

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<th>Emission Unit</th>
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<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
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**PTE of Each Emissions Unit Prior to the Revision (tons/yr)**

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<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
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**PTE of Each Emissions Unit After the Revision (tons/yr)**

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**PTE Increased of the Revision (tons/yr)**

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**Total PTE Increase of Modification:** 3.22 3.22 3.22 0.00 0.00 39.13 0.00 0.11
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<td>4.30</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
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<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

**METHODOLGY**

Pounds of VOC per Gallon Coating = (Density x % by weight) / (1 Volume % water)

Pounds of VOC per Gallon Coating = (Density x % by weight) * (1 Volume % water)

Pounds of VOC per Gallon Coating = (Density x % by weight) * (1 Volume % water) / 0.95

Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating x Gallons used x (8760 hr/yr) x (1 ton/2000 lbs)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating x Gallons used x (8760 hr/yr) x (1 ton/2000 lbs)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating x Gallons used x (8760 hr/yr) x (1 ton/2000 lbs)

Pounds of VOC per Gallon Coating = (Density x % by weight) / (1 Volume % water)

Total VOC = Total VOC for all coatings used
### Emission Calculations

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

### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Maximum (unit/hr)</th>
<th>Weight % HAP</th>
<th>HAPS Emission Rate (tons/yr)</th>
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<tbody>
<tr>
<td>Acetone/300 solvent</td>
<td>8.57</td>
<td>0.055</td>
<td>2.50</td>
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<tr>
<td>Isopropanol</td>
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<td>Propylene glycol</td>
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<td>0.055</td>
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<td>Acetone</td>
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<td>0.055</td>
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</tr>
<tr>
<td>Ethanol</td>
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<td>0.00%</td>
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<td>Formamide</td>
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<td>Hexane</td>
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<tr>
<td>Sopraline blue wax</td>
<td>0.00</td>
<td>0.06</td>
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<td>0.00%</td>
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<tr>
<td>Sopraline red wax</td>
<td>0.00</td>
<td>0.06</td>
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<td>0.00%</td>
</tr>
<tr>
<td>Sopraline white wax</td>
<td>0.00</td>
<td>0.06</td>
<td>2.00</td>
<td>0.00%</td>
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<tr>
<td>Sopraline green wax</td>
<td>0.00</td>
<td>0.06</td>
<td>2.00</td>
<td>0.00%</td>
</tr>
<tr>
<td>Sopraline metallic wax</td>
<td>0.00</td>
<td>0.06</td>
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<td>0.00%</td>
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<tr>
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<td>0.00</td>
<td>0.06</td>
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<tr>
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<td>0.06</td>
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<td>0.00%</td>
</tr>
<tr>
<td>Sopraline black wax</td>
<td>0.00</td>
<td>0.06</td>
<td>2.00</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (Lb/Gal) \times \text{Gal of Material (gal/unit)} \times \text{Maximum (unit/hr)} \times \text{Weight % HAP} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}
## Appendix A: Emissions Calculations

### Surface Coating Operation

#### Assembly Line Paint Repair (L13)

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Winnebago of Indiana, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>201 14th Street, Middlebury, Indiana, 46540</td>
</tr>
<tr>
<td>Permit No.:</td>
<td>039-43524-00444</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Michaela Hecox</td>
</tr>
<tr>
<td>Date:</td>
<td>12/4/2020</td>
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#### VOC and PM

<table>
<thead>
<tr>
<th>Material</th>
<th>Product ID Code</th>
<th>Density</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Sol % in Air &amp; Vapors</th>
<th>Methodology</th>
<th>Viscosity</th>
<th>VOC per Gallon of Coating (lb/gal)</th>
<th>Potential VOC Pounds per Hour</th>
<th>Potential VOC Pounds per Day</th>
<th>Potential VOC Tons per Year</th>
<th>Particulate Potential Tons per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACE premium enamel (black paint)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>16430, 16483, 16488</td>
<td>6.17</td>
<td>81.00% 33.00% 48.00% 33.00%</td>
<td>0.50</td>
<td>4.42</td>
</tr>
<tr>
<td>Acrylic Lacquer Thinner</td>
<td>DT-10</td>
<td>6.83</td>
<td>100.00%</td>
<td>14.00%</td>
<td>86.00%</td>
<td>14.00%</td>
<td></td>
<td>0.0012</td>
<td>0.50</td>
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<td>Aeromax spot prime</td>
<td>AM800</td>
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<td>91.00%</td>
<td>50.00%</td>
<td>41.00%</td>
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<td>0.50</td>
<td>5.66</td>
<td>2.83</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Clear aerosol (color coat gloss)</td>
<td>SEM13013</td>
<td>6.27</td>
<td>92.00%</td>
<td>39.40%</td>
<td>52.60%</td>
<td>39.00%</td>
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<td>0.50</td>
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<td>Diamont basecoat mix</td>
<td>DZPT, DZQT</td>
<td>11.12</td>
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<td>70.00%</td>
<td>0.00%</td>
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<td>7.78</td>
<td>7.78</td>
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<td>0.05</td>
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<td>15.00%</td>
<td>85.00%</td>
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<td>0.50</td>
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<td>Diamont spot and panel reducer</td>
<td>UR30</td>
<td>6.93</td>
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<td>5.00%</td>
<td>95.00%</td>
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<td>6.93</td>
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<td>DH14</td>
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<td>30.50%</td>
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<td>0.50</td>
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<td>2.84</td>
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<td>0.00%</td>
<td>99.00%</td>
<td>0.00%</td>
<td></td>
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<td>53.40%</td>
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<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
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<td>0.50</td>
<td>6.46</td>
<td>6.46</td>
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<td>98.80%</td>
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<td>20.00%</td>
<td>80.00%</td>
<td>15.00%</td>
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<td>5.88</td>
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<td>0.01</td>
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<td>Fiberglass hardener</td>
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<td>99.00%</td>
<td>0.00%</td>
<td></td>
<td>0.0030</td>
<td>0.50</td>
<td>7.19</td>
<td>7.19</td>
<td>0.01</td>
</tr>
</tbody>
</table>

### METHODOLOGY

- **Pounds of VOC per Gallon of Coating less Water**: Density (lb/gal) * Weight % Organics / (1-Volume % water)
- **Pounds of VOC per Gallon of Coating**: Density (lb/gal) * Weight % Organics
- **Potential VOC Pounds per Hour**: Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- **Potential VOC Pounds per Day**: Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- **Potential VOC Tons per Year**: Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- **Particulate Potential Tons per Year**: (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
- **Pounds VOC per Gallon of Solids**: Density (lbs/gal) * Weight % organics / (Volume % solids)
- **Total**: Worst Coating  + Sum of all solvents used
<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum Weight %</th>
<th>Weight % of HAPs</th>
<th>Emission (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACE premium enamel (black paint)</td>
<td>6.17</td>
<td>0.00</td>
<td>0.50</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>6.83</td>
<td>0.00</td>
<td>0.50</td>
<td>0.00%</td>
<td>0.00%</td>
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<tr>
<td>Aeromax spot prime</td>
<td>6.90</td>
<td>0.00</td>
<td>0.50</td>
<td>3.00%</td>
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<td>Clear aerosol color coat gloss</td>
<td>6.27</td>
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<td>0.00%</td>
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</table>

**METHODOLOGY**

HAPs emission rate (ton/yr) = Density (lb/gal) * Gallons of Material (gal/unit) * Maximum (unit/hr) * Weight % of HAP * 8760 hrs/yr * 1 ton/2000 lbs
### VOC and PM

### Appendix A: Emission Calculations

#### Surface Coating Booths HAPs

**Company Name:** Winnebago of Indiana, LLC  
**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**FESSP:** 839-4328-5644  
**Prepared By:** Michaela Rocco  
**Date:** 12/6/2020

#### Material List

- Sikaflex sealant  
- Krylon Fusion black spray paint  
- 1016 self leveling sealant  
- 880 general purpose cleaner  
- Fiberglass bodyfiller  
- Spot primer aerosol  
- Polyurethane gunfoam  
- PB999 floor adhesive  
- Geocel 2300 sealant

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<tr>
<th>Material</th>
<th>Density</th>
<th>Gallons of Material</th>
<th>Maximum</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Vinyl acetate</th>
<th>Methanol</th>
<th>Weight %</th>
<th>Hexane</th>
<th>Acetone</th>
<th>Ethanol</th>
<th>Benzene</th>
<th>Cumene</th>
<th>2-Methylpentane</th>
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**METHODOLOGY**

HAPs emission rate (ton/yr) = Density (lb/gal) * Gallon of Material (gal/unit) * Maximum (unit/hr) * Weight % * 0.0000 MWH * 1 ton/2000 lbs

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### Surface Coating Operation
#### Assembly Line Paint Repair (L3)

**Company Name:** Winnebago of Indiana, LLC  
**Source Address:** 201 14th Street, Middlebury, Indiana, 46540  
**Permit No.:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

#### VOC and PM

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<th>Material</th>
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<th>Density (lb/gal)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Weight % Organics</th>
<th>Exposure Period</th>
<th>Potential VOC Pounds per Hour</th>
<th>Potential VOC Pounds per Day</th>
<th>Potential VOC Tons per Year</th>
<th>Transfer Efficiency</th>
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<td></td>
</tr>
</tbody>
</table>

#### METHODOLOGY

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

- **Weight % Water & Exempts**
- **Weight % Organics**
### Emission Calculations

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Maximum (unit/hr)</th>
<th>Weight % HAP</th>
<th>Emissions (ton/yr)</th>
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<td>Fiberglass hardener</td>
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<tr>
<td>Diamont spot and panel reducer</td>
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<td>Clear aerosol (color coat gloss)</td>
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<td>0.02%</td>
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</table>

**METHODOLOGY**

HAPs emission rate (ton/yr) = Density (Lb/gal) * Gallons of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
## VOC and PM

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<th>VOC (ppm)</th>
<th>PM (ug/m^3)</th>
<th>Weight % Organics</th>
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<th>VOC ppm/gallons</th>
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<td>2.00</td>
<td>0.00</td>
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</tbody>
</table>
| 1. VOC and PM

**METHODOLOGY**

- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1 - Volume % water)

---

**Source Address:**
Michaela Hecox
201 14th Street, Middlebury, Indiana, 46540

**Permit No.:**

---

**Potential:**

---

Page 12 of 21, TSD App. A
### Emission Calculations

#### Napthalene

| Material                     | Density | Gal/unit | Max/Unit | Weight % | Weight % | Ethyl | Benzene | Weight % | Styrene | Weight % | Vinyl | Acetate | Weight % | Methanol | Weight % | Methyl | Isobutyl | Ketone | Weight % | Toluene | Weight % | Xylene | Toluene Emissions | Cumene Emissions | Ethyl | Benzene Emissions | ME1 | Styrene Emissions | Methanol | Vinyl | Acetate | Methyl | Isobutyl | Ketone | Total HAPs |
|------------------------------|---------|----------|----------|----------|----------|-------|---------|----------|---------|----------|-------|---------|----------|----------|----------|-------|---------|--------|----------|----------|---------|----------|----------|----------|----------|----------|----------|----------|
| 6411 Water based adhesive    | 0.85    | 0.0117   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.002          |
| Sikaflex sealant             | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.001          |
| 76-AM self leveling sealant  | 0.85    | 0.0004   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.000          |
| 8011 water based adhesive    | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.000          |
| Acetaldehyde based adhesives | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.002          |
| 70-71 adhesive               | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.005          |
| Light weight body filler     | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.003          |
| 501 general purpose sealant  | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.000          |
| 608 all purpose plastic seal | 0.85    | 0.0202   | 2.00     | 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%   | 0.00%  | 0.00%    | 0.00%    | 0.00%   | 0.00%    | 0.00%    | 0.00%    | 0.00%    | 0.002          |

#### METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
## Appendix A: Emissions Calculations

### Surface Coating Operation

#### Repair Line (L6)

**Company Name:** Winnebago of Indiana, LLC  
**Source Address:** 201 14th Street, Middlebury, Indiana, 46540  
**Permit No.:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

#### VOC and PM

<table>
<thead>
<tr>
<th>Material Description</th>
<th>Product ID Code</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatiles (H2O &amp; Organics)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Weight % Organics</th>
<th>Volatiles per Gallon Coating less Water &amp; Exempts</th>
<th>Units of Material</th>
<th>Volatiles per Gallon Coating</th>
<th>Potential VOC Pounds per Hour</th>
<th>Potential VOC Pounds per Day</th>
<th>Potential VOC Tons per Year</th>
<th>Particulate Potential Tons per Year</th>
<th>Substrate</th>
<th>Application Method</th>
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<tbody>
<tr>
<td>ACE premium enamel (black paint)</td>
<td>16430, 16483, 16488</td>
<td>6.17</td>
<td>81.00%</td>
<td>33.00%</td>
<td>48.00%</td>
<td>33.00%</td>
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<tr>
<td>Acrylic Lacquer Thinner</td>
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<td>100.00%</td>
<td>14.00%</td>
<td>86.00%</td>
<td>14.00%</td>
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<td>0.50</td>
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<td>0.02</td>
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</tr>
<tr>
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<td>50.00%</td>
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<td>0.50</td>
<td>5.66</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Clear aerosol (color coat gloss)</td>
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<td>92.00%</td>
<td>39.40%</td>
<td>52.60%</td>
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<td>0.50</td>
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<td>0.03</td>
<td>0.01</td>
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<tr>
<td>Diamont basecoat mix</td>
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<td>Diamont clear gel</td>
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<td>85.00%</td>
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<tr>
<td>Diamont spot and panel reducer</td>
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<td>0.00%</td>
<td>99.00%</td>
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<tr>
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<td>M102 0740</td>
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<td>0.00%</td>
<td>100.00%</td>
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<td>98.80%</td>
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</tr>
</tbody>
</table>

### Methodology

- **Pounds of VOC per Gallon Coating less Water**: \(\text{Density (lb/gal)} \times \text{Weight % Organics} / (1 - \text{Volume % water})\)
- **Pounds of VOC per Gallon Coating**: \(\text{Density (lb/gal)} \times \text{Weight % Organics}\)
- **Potential VOC Pounds per Hour**: \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)}\)
- **Potential VOC Pounds per Day**: \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)}\times (24 \text{hr/day})\)
- **Potential VOC Tons per Year**: \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)}\times (8760 \text{ hr/yr})\times (1 \text{ ton/2000 lbs})\)
- **Particulate Potential Tons per Year**: \((\text{units/hour}) \times (\text{gal/unit}) \times (\text{lbs/gal}) \times (1 - \text{Weight % Volatiles}) \times (1 - \text{Transfer efficiency}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lbs})\)

**Total = Worst Coating + Sum of all solvents used**
## Appendix A: Emission Calculations
### Surface Coating Booths HAPs
### Assembly Line Paint Repair (L6) HAPs

**Company Name:** Winnebago of Indiana, LLC  
**Address City:** Middlebury, Indiana, 46540  
**FESSP:** 039-43524-00444  
**Prepared By:** Michaela Hecox  
**Date:** 12/4/2020

<table>
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<tr>
<th>Material Description</th>
<th>Material Density (lb/gal)</th>
<th>Gallons of Material per Unit</th>
<th>Maximum Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Total HAPs</th>
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</thead>
<tbody>
<tr>
<td>ACE premium enamel (black paint)</td>
<td>6.17</td>
<td>0.0001</td>
<td>0.50</td>
<td>0.00%</td>
<td>20.60%</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<tr>
<td>Acrylic Lacquer Thinner</td>
<td>6.83</td>
<td>0.0012</td>
<td>0.50</td>
<td>0.00%</td>
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<td>0.00%</td>
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<td>0.00%</td>
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<tr>
<td>Clear aerosol (color coat gloss)</td>
<td>6.27</td>
<td>0.0007</td>
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<td>0.00%</td>
<td>10.00%</td>
<td>0.00%</td>
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<td>0.00%</td>
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<td>4.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>0.000</td>
</tr>
<tr>
<td>Diamont Fast 3.5 Prod clear</td>
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<td>0.50</td>
<td>3.00%</td>
<td>1.00%</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.002</td>
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<tr>
<td>Diamont spot and panel reducer</td>
<td>6.93</td>
<td>0.0007</td>
<td>0.50</td>
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<td>0.00%</td>
<td>0.00%</td>
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<td>0.00%</td>
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<tr>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.002</td>
</tr>
<tr>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.001</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.000</td>
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<td>0.00%</td>
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<tr>
<td>Touch N Tone spray paint</td>
<td>6.25</td>
<td>0.0035</td>
<td>0.50</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>15.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.000</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gallons of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs
Appendix A: Emission Calculations
Woodworking Operations (B3DC, B7DC, B6DC)

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
FESOP: 039-43524-00444
Prepared By: Michaela Hecox
Date: 12/4/2020

<table>
<thead>
<tr>
<th>Unit ID/Control Device</th>
<th>Control Efficiency (%)</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)</th>
<th>Gas or Air Flow Rate before Controls (acfm.)</th>
<th>PM Emission Rate before Controls (lb/hr)</th>
<th>PM Emission Rate after Controls (lb/hr)</th>
<th>PM Emission Rate after Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B3DC</td>
<td>97.5%</td>
<td>0.0005</td>
<td>7712</td>
<td>1.37</td>
<td>0.034</td>
<td>0.151</td>
</tr>
<tr>
<td>B7DC</td>
<td>99.0%</td>
<td>0.0005</td>
<td>6460</td>
<td>2.769</td>
<td>0.028</td>
<td>0.121</td>
</tr>
<tr>
<td>B6DC</td>
<td>97.5%</td>
<td>0.0005</td>
<td>6000</td>
<td>1.070</td>
<td>0.027</td>
<td>0.117</td>
</tr>
</tbody>
</table>

Total 5.213 22.834 0.089 0.389

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (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

<table>
<thead>
<tr>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable Emissions (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.00</td>
<td>6.5</td>
</tr>
<tr>
<td>1.00</td>
<td>4.1</td>
</tr>
</tbody>
</table>

326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Wood Working</th>
<th>Process Rate (materials throughput) (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B3 &amp; B7 WW</td>
<td>4.000</td>
<td>2.000</td>
<td>6.523</td>
<td>28.572</td>
</tr>
<tr>
<td>B6 WW</td>
<td>2.000</td>
<td>1.000</td>
<td>4.100</td>
<td>17.958</td>
</tr>
</tbody>
</table>

Methodology

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)*0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000
**HAZARDOUS AIR POLLUTANTS**

**MDI emission calculation methodology provided below**

**Lamination (L1)**

**Lamination (L2)**

**Lamination (L1) Hinkel**

**Lamination (L2) IFS Industries**

**Lamination (L2) IFS Industries 2352 Cleaner**

**Sidewall Lamination (L1)**

**Sidewall Lamination (L2)**

**Purmelt QR**

**Purmelt QR**

**METHODOLOGY**

**Formula - MDI**

\[ W = \text{Evaporative Losses (grams/day)} \]

**Formula - PM10** (from Stack Test data)

\[ \text{Assume TSP} = 0.005 \text{ g/cc} \]

\[ \text{Flowrate} = 500 \text{ acfm} \]

\[ \text{Fracrate} = 8760 \text{ hrs/yr} \]

\[ \text{Flowrate} \times \text{Grain Loading} \times 8760 \text{ hrs/yr} = \text{tons/yr} \]

\[ \text{Fracrate} = \text{tons/yr} \]

\[ \text{MDI} = \text{grams/day} \]

\[ \text{MBK} = \text{grams/day} \]

**Prepared By:** Michaela Hecox

**Date:** 12/4/2020

**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540

**Company Name:** Winnebago of Indiana, LLC

**FESOP:** 039-43524-00444

**Page 17 of 21, TSD App. A**
## Appendix A: Emission Calculations

### Building 5 Cutting Operations (B5-DC1 & B5-DC2)

**Company Name:** Winnebago of Indiana, LLC  
**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**FESOP:** 039-43524-00444  
**Prepared By:** Michaela Hecox  
**Date:** 12/4/2020

<table>
<thead>
<tr>
<th>Unit ID/Control Device</th>
<th>Control Efficiency (%)</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)</th>
<th>Gas or Air Flow Rate before Controls (acfm.)</th>
<th>PM Emission Rate before Controls (lb/hr)</th>
<th>PM Emission Rate after Controls (lb/hr)</th>
<th>PM Emission Rate after Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B5-DC1</td>
<td>97.5%</td>
<td>0.0005</td>
<td>5000</td>
<td>0.89</td>
<td>3.9</td>
<td>0.022</td>
</tr>
<tr>
<td>B5-DC2</td>
<td>97.5%</td>
<td>0.0005</td>
<td>5000</td>
<td>0.89</td>
<td>3.9</td>
<td>0.022</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td>1.783</td>
<td>7.809</td>
<td>0.045</td>
</tr>
</tbody>
</table>

#### Methodology

- Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (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)

<table>
<thead>
<tr>
<th>Allowable Rate of Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process Weight Rate (tons/hr)</td>
</tr>
<tr>
<td>----------------------------</td>
</tr>
<tr>
<td>2.00</td>
</tr>
</tbody>
</table>

#### 326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Wood Working</th>
<th>Process Rate (materials throughput) (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Wood</strong></td>
<td>4,000</td>
<td>2.000</td>
<td>6.523</td>
<td>28.572</td>
</tr>
</tbody>
</table>

#### Methodology

- Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67
- Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)/8760)/2000
### Appendix A: Emissions Calculations
#### Natural Gas Combustion Only

**Company Name:** Winnebago of Indiana, LLC  
**Address:** 201 14th Street, Middlebury, Indiana, 46540  
**FESOP:** 039-43524-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

### Heat Input Capacity

<table>
<thead>
<tr>
<th>Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB-016 (H1)</td>
<td>0.08</td>
</tr>
<tr>
<td>SB017 - SB022 (H2-H7)</td>
<td>0.960</td>
</tr>
<tr>
<td>SB-023 (H8)</td>
<td>0.400</td>
</tr>
<tr>
<td>SV25 - SV29 (H9-H13)</td>
<td>2.000</td>
</tr>
<tr>
<td>Building 5, SV30 &amp; SV31 (PSAM1 &amp; PSAM2)</td>
<td>7.600</td>
</tr>
<tr>
<td>Building 6, SV32 - SV35 (PSAM1-PSAM3)</td>
<td>10.500</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>21.54</strong></td>
</tr>
</tbody>
</table>

#### HHV

<table>
<thead>
<tr>
<th>MM Btu/hr</th>
<th>MM CF/yr</th>
<th>mmscf</th>
</tr>
</thead>
<tbody>
<tr>
<td>21.5</td>
<td>1020</td>
<td>185.0</td>
</tr>
</tbody>
</table>

### Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td><strong>Potential Emission in tons/yr</strong></td>
<td>0.176</td>
<td>0.703</td>
<td>0.703</td>
<td>0.055</td>
<td>9.250</td>
<td>0.509</td>
<td>7.770</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 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.

- **WMMBtu = 1,000,000 Btu**
- **MMCF = 1,000,000 Cubic Feet of Gas**

**Emission Factors**

- **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**
- **Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu**
- **Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton**

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>0.000194</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

**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: Emissions Calculations

#### Welding

**Company Name:** Winnebago of Indiana, LLC  
**Address City IN Zip:** 201 14th Street, Middlebury, Indiana, 46540  
**Permit No.:** 039-45234-00444  
**Reviewer:** Michaela Hecox  
**Date:** 12/4/2020

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS * (lb pollutant / lb electrode)</th>
<th>EMISSIONS (lb/hr)</th>
<th>TOTAL HAPS (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>STICK (FUG-41)</td>
<td>1</td>
<td>0.03125</td>
<td>PM = PM10 0.037 0.003 0.00 0.00</td>
<td>0.001 9.38E-05 0.00 0.00</td>
<td>0.000</td>
</tr>
<tr>
<td>STICK (FUG-42)</td>
<td>1</td>
<td>0.03125</td>
<td>PM = PM10 0.037 0.003 0.00 0.00</td>
<td>0.001 9.38E-05 0.00 0.00</td>
<td>0.000</td>
</tr>
</tbody>
</table>

**EMISSION TOTALS**

**Potential Emissions lbs/hr**

- 0.00 1.88E-04 0.00 0.00 0.00

**Potential Emissions lbs/day**

- 0.06 4.63E-03 0.00 0.00 0.00

**Potential Emissions tons/year**

- 0.01 8.21E-04 0.00 0.00 0.00

**METHODOLOGY**

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb pollutant/lb of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Winnebago of Indiana, LLC
Address City IN Zip: 201 14th Street, Middlebury, Indiana, 46540
Permit Number: 039-43524-00444
Reviewer: Michaela Hecox
Date: December 4, 2020

Paved Roads at Industrial Site
The following calculations determine the amount of emissions from paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mile/day)</th>
<th>Maximum one-way miles (mile/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>1.0</td>
<td>10.0</td>
<td>10.0</td>
<td>12.0</td>
<td>120.0</td>
<td>125</td>
<td>0.024</td>
<td>0.2</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>1.0</td>
<td>10.0</td>
<td>10.0</td>
<td>12.0</td>
<td>120.0</td>
<td>125</td>
<td>0.024</td>
<td>0.2</td>
</tr>
</tbody>
</table>

Total 20.0 240.0 0.5 172.8

Average Vehicle Weight Per Trip = 12.0 tons/trip
Average Miles Per Trip = 0.02 miles/trip

Unmitigated Emission Factor, \( E_f = [k * (sL/2)^0.65 * (W/3)^1.5 - C] \) (Equation 1 from AP-42 13.2.1)

where:
- \( k = 0.082 \) 0.016 0.0024 \( \text{lb/mi} \) = particle size multiplier (AP-42 Table 13.2.1-1)
- \( W = 12.0 \) 12.0 12.0 \( \text{tons} \) = average vehicle weight (provided by source)
- \( C = 0.00047 \) 0.00047 0.00047 \( \text{lb/mi} \) = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
- \( sL = 0.6 \) 0.6 0.6 \( \text{g/m}^2 \) = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E_f * [1 - (p/4N)] \)

Mitigated Emission Factor, \( E_{ext} = E_f * [1 - (p/4N)] \)

where:
- \( p = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
- \( N = 365 \) days per year

Mitigated Emission Factor, \( E_{ext} = E_f * [1 - (p/4N)] \)

Unmitigated Emission Factor, \( E_f = 0.299 \) 0.058 0.008 \( \text{lb/mile} \)
Mitigated Emission Factor, \( E_{ext} = 0.274 \) 0.053 0.008 \( \text{lb/mile} \)

Dust Control Efficiency = 50% 50% 50% (pursuant to control measures outlined in fugitive dust control plan)

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>1.3E-02</td>
<td>2.5E-03</td>
<td>3.6E-04</td>
<td>1.2E-02</td>
<td>2.3E-03</td>
<td>3.3E-04</td>
<td>8.3E-03</td>
<td>1.1E-03</td>
<td>1.6E-04</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>1.3E-02</td>
<td>2.5E-03</td>
<td>3.6E-04</td>
<td>1.2E-02</td>
<td>2.3E-03</td>
<td>3.3E-04</td>
<td>5.9E-03</td>
<td>1.1E-03</td>
<td>1.6E-04</td>
</tr>
</tbody>
</table>

0.026 0.01 0.00 0.02 0.00 0.00 0.01 0.00 0.00

Abbreviations
- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PTE = Potential to Emit
- Maximum Weight loaded (tons) = \([\text{Maximum Weight Loaded (tons/trip)}] * [\text{Maximum trips per day (trip/day)}] \)
- Maximum one-way distance (mile/day) = \([\text{Maximum one-way distance (feet/trip)}] / [5280 \text{ ft/mile}])
- Maximum one-way miles (mile/day) = \([\text{Maximum one-way distance (mile/day)}] * [\text{Maximum trips per day (trip/day)}] \)
- Average Vehicle Weight Per Trip (tons/trip) = \([\text{SUM} \text{Total Weight driven per day (ton/day)}] / [\text{SUM} \text{Maximum trips per day (trip/day)}] \)
- Average Miles Per Trip (miles/trip) = \([\text{SUM} \text{Maximum one-way miles (mile/day)}] / [\text{SUM} \text{Maximum trips per day (trip/day)}] \)
- Unmitigated PTE (tons/yr) = \([\text{Maximum one-way miles (mile/yr)}] * [\text{Unmitigated Emission Factor (lb/mile)}] * [\text{ton/2000 lbs}] \)
- Mitigated PTE (tons/yr) = \([\text{Maximum one-way miles (mile/yr)}] * [\text{Mitigated Emission Factor (lb/mile)}] * [\text{ton/2000 lbs}] \)
- Controlled PTE (tons/yr) = \([\text{Mitigated PTE (tons/yr)}] * [\text{1 - Dust Control Efficiency}] \)

Methodology
- Total Weight driven per day (ton/day) = \([\text{Maximum Weight Loaded (tons/trip)}] * [\text{Maximum trips per day (trip/day)}] \)
- Maximum one-way distance (mile/trip) = \([\text{Maximum trips per year (trip/day)}] * [\text{Maximum one-way distance (mile/trip)}] \)
- Average Vehicle Weight Per Trip (tons/trip) = \([\text{SUM} \text{Total Weight driven per day (ton/day)}] / [\text{SUM} \text{Maximum trips per day (trip/day)}] \)
- Average Miles Per Trip (miles/trip) = \([\text{SUM} \text{Maximum one-way miles (mile/day)}] / [\text{SUM} \text{Maximum trips per day (trip/day)}] \)
- Emission Factor (lb/mile) = \([\text{Unmitigated Emission Factor (lb/mile)}] * [\text{ton/2000 lbs}] \)
- Dust Control Efficiency = \([\text{Mitigated PTE (tons/yr)}] * [\text{1 - Dust Control Efficiency}] \)
January 13, 2021

Niall Geoghegan
Winnebago of Indiana, LLC
201 14th Street
Middlebury, IN 46540

Re: Public Notice
Winnebago of Indiana, LLC
Permit Level: FESOP-Significant Permit Revision
Permit Number: 039-43524-00444

Dear Mr. Niall Geoghegan:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option by Permit Number, then enter permit 43524

and

IDEM’s Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Middlebury Public Library, 101 East Winslow Street, PO Box 192 in Middlebury, IN 46540. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Michaela Hecox, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 13, 2021

To: Middlebury Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Winnebago of Indiana, LLC
Permit Number: 039-43524-00444

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 13, 2021
Winnebago of Indiana, LLC
039-43524-00444

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
## Mail Code 61-53

### Name and address of Sender

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<td>Mr. Doug Elliott, D &amp; B Environmental Services, Inc., 401 Lincoln Way, West Osceola IN 46561 (Consultant)</td>
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