

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility: Winnebago Industries, Inc. -  
Forest City**

**Facility Location: 605 West Crystal Lake Rd, Forest City, IA 50436**

**Air Quality Operating Permit Number: 05-TV-002R3**

**Expiration Date: 03/09/2027**

**Permit Renewal Application Deadline: 09/09/2026**

**EIQ Number: 92-5528**

**Facility File Number: 95-01-001**

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**Responsible Official**

**Name: Mr. Roland Lester**

**Title: Vice President of Operations**

**Mailing Address: 605 West Crystal Lake Road, Forest City, IA 50436**

**Phone #: (641) 585-6651**

**Permit Contact Person for the Facility**

**Name: Mr. Wayne M. Venzke**

**Title: Environmental Engineer**

**Mailing Address: 605 West Crystal Lake Road, Forest City, IA 50436**

**Phone #: (641) 585-6760**

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

**For the Director of the Department of Natural Resources**



03/10/2022

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Marnie Stein, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CE .....	control equipment
CFR.....	Code of Federal Regulations
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
gr/dscf .....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MDI.....	4, 4'-methylene diphenyl diisocyanate
MVAC.....	motor vehicle air conditioner
NSPS .....	new source performance standard
ppmv .....	parts per million by volume
lb/hr .....	pounds per hour
lb/MMBtu .....	pounds per million British thermal units
scfm.....	standard cubic feet per minute
TPY .....	tons per year
USEPA.....	United States Environmental Protection Agency

## Pollutants

PM.....	particulate matter
PM <sub>10</sub> .....	particulate matter ten microns or less in diameter
SO <sub>2</sub> .....	sulfur dioxide
NO <sub>x</sub> .....	nitrogen oxides
VOC .....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Winnebago Industries, Inc. – Forest City

Permit Number: 05-TV-002R3

Facility Description: Primary: Motor Homes Production (SIC 3716)

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## Equipment List

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### A. Dust Collectors

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
981-D01-P	981-D01-U	North Sawmill Dust Collector Exhaust	96-A-093-S4
981-D03-P	981-D03-U	South Sawmill Dust Collector Exhaust	96-A-094-S5
979-D01-P	971-D01-U	Foam Shaping Process (4 routers, 4 saws, 2 grinders, and 1 foam densifier)	16-A-269

### B. Mix Rooms

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
951-E01-P	951-E01-U	Vertical Paint Mix Room	96-A-1321
959-E01-P	959-E01-U	Shipout Paint Vault Exhaust	05-A-469-S1
970-E01-P	970-E01-U	Customer Service Mix Room	96-A-1319-S1
979-E01-P	979-E01-U	Line 4 Paint Mix Room	96-A-104
987-E01-P	987-E01-U	Full Body Paint Mix Room	02-A-370-S2

### C. Internally Vented Sources

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
920-F01-P	920-F01-U	Fiberglass Fugitives	NA
959-F01-P	959-F01-U	Shipout Fugitives	NA
977-F01-P	977-F01-U	Chassis Prep Area Fugitives	NA
979-F01-P	979-F01-U	Motor Home Plant Fugitives	NA
990-F01-P	990-F01-U	Powder Paint Area Fugitives	NA

**D. Hot Melt – Roll Coaters**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
979-G01-P	979-G01-U	MHP Panel Lam. Roll Coaters	01-A-1057-S2
979-G02-P	979-G02-U	MHP Panel Lam. Roll Coaters	01-A-1059-S2
979-G03-P	979-G03-U	MHP Panel Lam. Roll Coaters	01-A-1062-S2
979-G04-P	979-G04-U	MHP Panel Lam. Roll Coaters	01-A-1063-S2
979-G05-P	979-G05-U	MHP Panel Lam. Roll Coaters	01-A-1064-S2
979-G06-P	979-G06-U	MHP Panel Lam. Roll Coaters	01-A-1065-S2
973-G01-U	973-G01-U	Rollcoater – Reactive Hot Melt Glue Machine	21-A-399

**E. Glue Operations – Sawmill - Roll Applicators**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
981-G04-P	981-G04-U	Sawmill Glue Machine Exhaust Stack – Roll Applicator	96-A-761-S2

**F. Ovens**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
977-O10-P	977-O10-U	Electrocoat Bake Oven Zone 2	Exempt
977-O11-P	977-O11-U	Electrocoat Bake Oven Zone 1	Exempt
977-O12-P	977-O12-U	Powder Coat Bake Oven (IR)	Exempt
977-O14-P	977-O14-U	Powder Coat Bake Oven Cure	Exempt
990-O03-P	990-O03-U	Powder Paint Cure Oven Combustion Exhaust	96-A-1293-S2
	990-O04-U	Powder Paint Cure Oven VOC Exhaust	

**G. Cutting/Grinding/Stripping Operations**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
973-P06-P	973-P06-U	Plastic Grinder	04-A-555
978-P01-P	978-P01-U	Laser Cutting Machine	98-A-206
978-P03-P	978-P03-U	Laser Cutting Machine	99-A-408-S1
978-P04-P	978-P04-U	Laser Cutting Machine	00-A-641-S2
991-P01-P	991-P01-U	CAPCO Extrusion Line Die Strip Tank Exhaust	96-A-701-S2

**H. Customer Service Booths**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
970-S01-P	970-S01-U	Customer Service Dry Filter Paint Booth - West Stack	90-A-062-S3
970-S02-P		Customer Service Dry Filter Paint Booth - East Stack	99-A-307-S2
970-S03-P	970-S03-U	Customer Service Dry Filter Adhesive Booth – North Stack	02-A-038-S2
970-S04-P		Customer Service Dry Filter Adhesive Booth – South Stack	02-A-039-S2
970-S05-P	970-S05-U	Customer Service Cabinet Bench Stain Spray Booth	02-A-040-S3

**I. Van Conversion Booths**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
973-S01-P	973-S01-U	East Van Shop Paint Booth	92-A-657-S5
973-S02-P	973-S02-U	West Van Shop Paint Booth	92-A-658-S5
973-S05-P	973-S05-U	Van Shop Surface Preparation Booth	96-A-088-S2

**J. Custom Shells Booths**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
984-S03-P	984-S03-U	Custom Shells Booth #1	19-A-443-S2
984-S04-P	984-S04-U	Custom Shells Booth #2	19-A-444-S2

**K. Fiberglassing Booths**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
982-S08-P	982-S08-U	Tooling Resin Spray Booth	96-A-092-S5
982-S09-P			96-A-090-S2
982-S11-P	982-S11-U	Fiberglass Chop Booth	09-A-489-P3
982-S12-P			09-A-490-P3
982-S13-P			09-A-491-P3
982-S14-P	982-S14-U	Gelcoat Booth	09-A-492-P3

### L. Full Body Paint Spray Booths

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
987-S02-P	987-S02-U	Full Body Paint – Basecoat Spray Booth	11-A-461
987-S03-P			00-A-601-S1
987-S04-P	987-S04-U	Full Body Paint – Clearcoat Spray Booth	98-A-212-S3
987-S05-P			00-A-602-S2

### M. Paint / Spray Booths

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
982-S10-P	982-S10-U	Model Shop Paint Booth	06-A-1146
987-S01-P	987-S01-U	Maintenance Dry Filter Spray Booth	96-A-089-S1

### N. Test Vehicle Exhausts

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
959-P02-P	959-P02-U	Shipout Road Test Booth	05-A-571
970-V01-P	970-V01-U	Customer Service Motorhome Exhaust	05-A-041-S1
977-V01-P	977-V01-U	Chassis Weld Vehicle Exhaust	07-A-1348-S1
978-V01-P	978-V01-U	Warranty Motorhome Exhaust	05-A-042-S1
978-V02-P	978-V02-U	Warranty Motorhome Exhaust	05-A-043-S1
979-V05-P	979-V05-U	Motor Home Plant Line 2 Vehicle Exhaust	07-A-1278
989-V01-P	989-V01-U	Truck Shop Vehicle Exhaust	05-A-044-S1
989-V03-P	989-V03-U	Truck Shop Vehicle Exhaust	05-A-046-S1

### O. Miscellaneous Sources

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
952-S01-P	952-S01-U	Emissions Attributed To Aerosol Can Point Of Use	05-A-040-S2
967-P01-P	967-P01-U	De-gas Fuel Inerting System	05-A-038-S1
977-C08-P	977-C08-U	Cleaning Tank	Exempt
977-C09-P	977-C09-U	Cleaning Tank	Exempt
977-F10-P	977-F10-U	Electrocoat Tank	14-A-569
977-PC1-P	977-PC1-U	E-Coat Small Part Powder Coating Booth	Exempt
990-PC1-P	990-PC1-U	CAPCO Powder Coating Booth	Exempt

**P. Stationary Reciprocating Internal Combustion Engine Sources**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
CCEG-P	CCEG-U	Computer Center Emergency Generator (300 HP)	Exempt
SEG-P	SEG-U	Security Emergency Generator (42.5 HP)	Exempt
PREG-P	PREG-U	Phone Room Emergency Generator (42.5 HP)	Exempt

**Q. Heaters**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
973-004-P	973-004-U	Rotocast 1500 Oven Exhaust	Exempt
973-006-P	973-006-U	Rotocast 1500 Oven Exhaust	Exempt
973-008-P	973-008-U	Rotocast 430 Oven Exhaust	Exempt



## Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
970-F01-U	Customer Service Area Fugitives
970-F02-U	Customer Service Welding Fugitives
971-F01-U	Stitchcraft Area Fugitives
972-F01-U	Plastic Fugitives
972-F02-U	Plastic Chipper
973-F02-U	Van Shop/Rotocasting Fugitives
973-T01-U	East Compounding Silo Vent
973-T02-U	West Compounding Silo Vent
977-F02-U	Welding Emissions (1st & 2nd Floor Chassis Prep)
977-F03-U	Adhesive/Sealant Spray Emissions
977-F04-U	Large Part E-Coat Fugitives
977-C06-U	Electrocoat Tube Heat Exchanger
977-C07-U	Electrocoat Tube Heat Exchanger
978-F02-U	Laser Tube Pipe Cutter Dust Collector
978-F03-U	Laser Tube Pipe Cutter Dust Collector
978-F04-U	Laser Cutter (Salvagnini) - 2 Dust Collectors
979-F02-P	Motor Home Plant Sidewall Router
979-F05-U	Motor Home Plant Welding Fugitives
981-F01-U	Sawmill Fugitives
981-DC1-U	Timesaver Dust Collector
981-DC2-U	Edgeband Dust Collector
982-F01-U	Mold Room/Prototype Area Fugitives
982-F02-U	Sawmill Welding Fugitives
986-F01-U	Line 1 Warehouse Area Fugitives
987-F01-U	Full Body Paint Area Fugitives
990-W05-U	Powder Paint Washer Burner Exhaust
991-F02-U	CAPCO Welding Fugitives
991-O02-P	Line 1 Billet Oven
991-O03-P	East Heat Treatment Exhaust Stack
992-F01-P	Steel Shot Blast Machine
DSLGEN-P	Diesel Portable Generator
DSLTKN-P	Diesel Storage Tank at Maintenance
DSLTKN2-P	Diesel Tank at Chassis Plant
GASTNK-P	Gasoline Storage Tank at Chassis
GASTNK2-P	Gasoline Storage Tank at DeGas
HEAT-P	Collective Emissions All Unit Heaters (approximately 291 Heaters)
MAKUP-P	Collective Emissions All Makeup Heaters (approximately 53 Units)
TRB-W01	Wand Washer – Tank Removal Building

## II. Plant-Wide Conditions

Facility Name: Winnebago Industries, Inc. – Forest City

Permit Number: 05-TV-002R3

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

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### Permit Duration

The term of this permit is: 5 years

Commencing on: 03/10/2022

Ending on: 03/09/2027

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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### Emission Limits

*Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:*

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be

used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

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## **NESHAP Applicability**

### **40 CFR Part 63 Subpart A Requirements**

This facility is an affected source and these *General Provisions* apply to the facility. The affected units are listed under the applicable subparts below.

See Appendix A for a link to the Standard.

Authority for Requirements: 40 CFR Part 63 Subpart A  
567 IAC 23.1(4)"a"

### **40 CFR Part 63 Subpart JJ Requirements**

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Wood Furniture Manufacturing Operations*. The affected units are 970-S05-U, 981-G04-U, 982-S10-U, and 984-S03-U and 984-S04-U.

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart JJ  
567 IAC 23.1(4)"aj"

#### 40 CFR Part 63 Subpart Mmmm Requirements

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Surface Coating of Miscellaneous Metal Parts and Products*. The affected units are:

Emission Unit	Emission Unit	Emission Unit
959-E01-U	977-O14-U	982-S10-U
959-F01-U	977-PC1-U	987-F01-U
970-S01-U	979-F01-U	987-S01-U
970-S03-U	979-F06-U	987-S02-U
973-F01-U	979-F07-P	987-S04-U
973-F03-U	979-G01-U	990-F01-U
973-S02-U	979-G04-U	990-O03-U
977-F01-U	979-G05-U	990-O04-U
977-C08-U	979-G06-U	990-PC1-U
977-C09-U	982-F01-U	973-G01-U

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart Mmmm  
567 IAC 23.1(4)"cm"

#### 40 CFR Part 63 Subpart Pppp Requirements

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Surface Coating of Plastic Parts and Products*. The affected emission units are:

Emission Unit	Emission Unit	Emission Unit
970-S01-U	979-G02-U	987-F01-U
970-S03-U	979-G04-U	987-S01-U
973-F01-U	979-G05-U	987-S04-U
973-F03-U	979-O01-U	990-F01-U
973-S01-U	979-S01-U	990-F01-U
973-S02-U	984-F01-U	973-G01-U
979-G01-U	984-S02-U	

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart Pppp  
567 IAC 23.1(4)"cp"

If you are subject to any other final surface coating NESHAP, you have the option of complying with each NESHAP separately, complying with the emission limit that represents the predominant surface coating activity at your facility (not including assembled on-road vehicle and automotive lamp coating operations), or you may develop a facility –specific emission limit [63.4481(e) (40 CFR 63 Subpart Pppp)].

Compliance with the individual NESHAPs at the emission unit level will be defined by the process the emission unit is performing at any given time. Refer to the individual NESHAP for alternative compliance methods allowed for under the rule.

Authority for Requirement: 40 CFR Part 63 Subpart PPPP

**40 CFR Part 63 Subpart WWWW Requirements**

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Reinforced Plastic Composites Production*. The affected emission units are 920-F01-U, 982-F01-U, 982-S08-U, 982-S11-U, and 982-S14-U.

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart WWWW  
567 IAC 23.1(4)"cw"

**40 CFR Part 63 Subpart ZZZZ Requirements**

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Stationary Reciprocating Internal Combustion Engines*. The affected units are CCEG-U, FREG-U, SEG-U, and PREG-U.

See Appendix A for a link to the Standard.

Authority for Requirements: 40 CFR Part 63 Subpart ZZZZ  
567 IAC 23.1(4)"cz"

**40 CFR Part 63 Subpart DDDDD Requirements**

This facility is subject to National Emission Standards For Hazardous Air Pollutants for *Industrial, Commercial, And Institutional Boilers And Process Heaters*. The affected units are 973-O04-U, 973-O06-U, 973-O08-U, 977-C06-U, 977-C07-U, and 990-W05-U

See Appendix A for a link to the Standard.

Authority for Requirements: 40 CFR Part 63 Subpart DDDDD

### III. Emission Point-Specific Conditions

Facility Name: Winnebago Industries, Inc.  
Permit Number: 05-TV-002R3

#### Emission Point ID: See Table A-1 - Dust Collectors

#### Associated Equipment

**Table A-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/Fuel	Rated Capacity (lb/hr)	Control Equipment ID	Control Equipment Description
981-D01-P	981-D01-U	North Sawmill Dust Collector Exhaust	Sawdust from Woodworking	372.66	981-D01-C	Cyclone with Bag Filter (2-Stage Collector)
981-D03-P	981-D03-U	South Sawmill Dust Collector Exhaust	Sawdust from Woodworking, Fiberglass	372.66	981-D03-C	Cyclone with Bag Filter (2-Stage Collector)

#### Applicable Requirements

*The following requirements apply to the emission points identified in Table A-1.*

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from each emission point listed in the table below shall not exceed the levels specified below.*

**Table A-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.3(2)"a"	PM (lb/hr)	Construction Permit Number
981-D01-P	981-D01-U	40% <sup>(1)</sup>	0.66	0.1	0.66	96-A-093-S5
981-D03-P	981-D03-U					96-A-094-S5

<sup>(1)</sup>An exceedance of the indicator opacity of "No Visible Emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

**Operational Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

**For EP 981-D01-P:**

- A. This unit shall process wood and plastic products only.
- B. The owner or operator shall maintain the control equipment (Dust Collector, CE 981-D01-C) in accordance with the manufacturer’s specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance conducted on the control equipment. This record shall include, but is not limited to:
  - a. The date any inspection and/or maintenance was performed on the control equipment;
  - b. Any issues identified during the inspection; and,
  - c. Any issues addressed during the maintenance activities.

**For EP 981-D03-P:**

- A. This unit shall process wood and fiberglass products only
- B. The owner or operator shall maintain the control equipment according to the manufacturer’s specifications and maintenance schedule.
- C. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the control equipment.

Authority for Requirement: DNR Construction Permits 96-A-093-S5, 96-A-094-S5

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

**Table A-3**

		Stack Characteristics				
Emission Point ID	Emission Unit ID	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
981-D01-P	981-D01-U	25.92	Horizontal	36 x 50	70	40,000
981-D03-P	981-D03-U	29.33	Horizontal	36 x 50	70	40,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

Authority for Requirement: DNR Construction Permits 96-A-093-S5, 96-A-094-S4

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 22.108(3)



**Compliance Assurance Monitoring Plan**  
**981-D01-P North Sawmill Dust Collector Exhaust**  
**981-D03-P- South Sawmill Dust Collector Exhaust**  
**(Authority for Requirement: 567 IAC 22.108(3))**

**I. Background**

A. Emission Unit

Description: Wood Dust Collection Systems

Emission Units: 981-D01-U and 981-D03-U

Facility: Winnebago Industries, Inc.  
605 West Crystal Lake Road  
Forest City, IA 50436

B. Applicable Regulation, Emission Limit, and Monitoring Requirements:

Regulation: 567 IAC 23.3 (2) "a"  
DNR Construction Permits 96-A-093-S4, 96-A-093-S5

Pollutant: PM<sub>10</sub> & PM

Emission Limit: 0.66 lb/hr PM<sub>10</sub>; 0.1 gr/dscf, 0.66 lb/hr PM

Opacity Limit: 40%

C. Control Technology:

Cyclone Collector Followed by a Baghouse

**II. Monitoring Approach**

The key elements of the monitoring approach are presented below in Table A. The selected performance indicators are baghouse module differential pressure and visible emissions.

**Table A - Monitoring Approach**

	Indicator #1	Indicator #2
I. Indicator	Differential pressure across baghouse.	Visible Emissions.
II. Measurement Approach	Differential pressure measured across the baghouse by a pressure gauge.	Visible emissions from baghouse exhaust while 981-DO1 and 981-DO3 are operating and exhausting to the outdoors. NOTE: This indicator is not applicable when the exhaust is vented internally during cold weather months.
III. Indicator Range	An excursion is defined as a differential pressure reading across the baghouse module outside the acceptable range. The acceptable range is 1.5 +/- 1.0 inches water.  Excursions trigger an inspection, corrective action and a recordkeeping requirement. The inspection that is triggered is a 6 minute visible emissions observation.	An excursion is defined as any visible emission occurring. Excursions trigger an inspection, corrective action, and a recordkeeping requirement. The inspection that is triggered is a 6 minute visible emissions observation.
IV. Performance Criteria		
A. Data Representativeness	The differential pressure is measured across the baghouse.	Visible emissions observations are made at the emission point and on the external baghouse unit, system ductwork and associated components.
B. Verification of Operational Status	The pressure gauge will be calibrated, operated, and maintained according to the manufacturer's specifications.	Not Applicable.
C. QA/QC Practices and Criteria	Pressure gauges will be calibrated, operated, and maintained according to the manufacturer's specifications.	The observer will be trained to detect visible emissions.
D. Monitoring Frequency	The differential pressure will be inspected a minimum of once per day when the baghouse is operating.	No visible emissions (NVE) observations are made at the emission point on a weekly basis.
E. Data Collection Procedures	Results of baghouse differential pressure checks will be recorded on record forms that will be kept a minimum of 5 years.	Results of "no visible emissions" observations are recorded on record forms that will be kept a minimum of 5 years.

## **Emission Point ID Number: 979-D01-P**

### Associated Equipment

Associated Emission Unit ID Number: 979-D01-U

Emissions Control Equipment ID Number: CE 979-D01-C1, CE 979-D01-C2

Emissions Control Equipment Description: Cyclone (CE 979-D01-C1), Baghouse (CE 979-D01-C2)

Continuous Emissions Monitors ID Numbers: N/A

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Emission Unit vented through this Emission Point: 979-D01-U

Emission Unit Description: Foam Shaping Process (4 routers, 4 saws, 2 grinders, and 1 foam densifier)

Raw Material/Fuel: Foam

Rated Capacity: 6.25 panels/hr

### **Applicable Requirements**

#### **Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 16-A-269  
567 IAC 23.3(2)"a"

<sup>(1)</sup> An exceedance of the indicator opacity of 'No Visible Emissions' will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf; 1.71 lbs/hr

Authority for Requirement: DNR Construction Permit 16-A-269  
567 IAC 23.3(2)"a"

#### **Operating Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

- A. The owner or operator shall maintain the Cyclone (CE 979-D01-C1) and the Baghouse (CE 979-D01-C2) according to the manufacturer's specifications and maintenance schedule. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Cyclone (CE 979-D01-C1) and the Baghouse (CE 979-D01-C2). This log shall include, but is not necessarily limited to:
  - a. The date and time any inspection and/or maintenance was performed on the Cyclone (CE 979-D01-C1) and the Baghouse (CE 979-D01-C2);

- b. Any issues identified during the inspection and the date each issue was resolved;
- c. Any issues addressed during the maintenance activities and the date each issue was resolved; and
- d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 16-A-269

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 26.75

Stack Opening, (inches, dia.): 37

Exhaust Flow Rate (scfm): 20,000

Exhaust Temperature (°F): 68

Discharge Style: Vertical unobstructed

Authority for Requirement: DNR Construction Permit 16-A-269

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table B-1 - Mix Rooms**

Associated Equipment

**Table B-1**

<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Raw Material/ Fuel</b>	<b>Rated Capacity</b>
951-E01-P	951-E01-U	Vertical Paint Mix Room	Paint, Solvents, Sealers	Variable
959-E01-P	959-E01-U	Shipout Paint Vault Exhaust	Paint, Solvents, Sealers	Variable
970-E01-P	970-E01-U	Customer Service Mix Room	Paint and Thinners	Variable
979-E01-P	979-E01-U	Line 4 Paint Mix Room	Paints and Solvents	Variable
987-E01-P	987-E01-U	Full Body Paint Mix Room	Paints and Thinners	Variable

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table B-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table B-2**

<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>VOC</b>	<b>DNR Construction Permit</b>
951-E01-P	951-E01-U	No emission limits at this time. VOC emissions from this source are assigned to emission points 951-S01-P and 951-S02-P	96-A-1321
959-E01-P	959-E01-U	No emission limits at this time.	05-A-469-S1
970-E01-P	970-E01-U	No emission limits at this time. VOC emissions from this source are assigned to emission points 970-S01-P and 970-S02-P	96-A-1319-S1
979-E01-P	979-E01-U	No emission limits at this time. VOC emissions from this source are assigned to emission points 979-S01-P through 979-S04-P	96-A-104
987-E01-P	987-E01-U	VOC emissions from this paint mix room are accounted for in the permits for the Full Body Paint Booths that this paint mix room supplies.	02-A-370-S2

**NSPS/NESHAP Applicability**

Emission point 951-E01-P is subject to 40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

Emission points 959-E01-P, 970-E01-P, 979-E01-P, and 987-E01-P are subject to 40 CFR 63 Subpart P National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts & Products.

Authority for Requirement: DNR Construction Permits listed in Table B-2

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

**Table B-3**

			Stack Characteristics				
Emission Point ID	Emission Unit ID	DNR Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
951-E01-P	951-E01-U	96-A-1321	2	Downward	18 (dia)	Ambient	3,000
959-E01-P	959-E01-U	05-A-469-S1	9	Horizontal	14 x 14	70	1,187
970-E01-P	970-E01-U	96-A-1319-S1	6.0	Horizontal	12 X 12	70	1,000
987-E01-P	987-E01-U	02-A-370-S2	20.0	Horizontal	12 x 12	70	2,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table C-1 - Internally Vented Sources**

Associated Equipment

**Table C-1**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>Raw Material</b>	<b>Rated Capacity</b>
920-F01-P	920-F01-U	Fiberglass Fugitives	Fiberglass	NA
959-F01-P	959-F01-U	Shipout Fugitives	Paints, Solvents, Adhesives & Like Materials	NA
977-F01-P	977-F01-U	Chassis Prep Area Fugitives	Paints, Solvents, Adhesives & Like Material	NA
979-F01-P	979-F01-U	Motor Home Plant Fugitives	Plastics	NA
990-F01-P	990-F01-U	Powder Paint Area Fugitives	Paints, Solvents, Adhesives/Sealants & Like Materials	NA

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table C-1.*

There are no applicable requirements at this time.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table D-1 – Hot Melt – Roll Coaters**

Associated Equipment

**Table D-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity (lb/hr)	Control Equipment ID	Control Equipment Description
979-G01-P	979-G01-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G01-C	Panel Filters
979-G02-P	979-G02-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G02-C	Panel Filters
979-G03-P	979-G03-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G03-C	Panel Filters
979-G04-P	979-G04-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G04-C	Panel Filters
979-G05-P	979-G05-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G05-C	Panel Filters
979-G06-P	979-G06-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	207	979-G06-C	Panel Filters
973-G01-P	973-G01-P	Rollcoater – Reactive Hot Melt Glue Machine	Reactive Hot Melt Adhesive	207	973-G01-C	Panel Filters

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table D-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from each emission point listed in the table below shall not exceed the levels specified below.*

**Table D-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM (gr/dscf) 567 IAC 23.4(13)	VOC (tons/yr)	DNR Construction Permit
979-G01-P	979-G01-U	40% <sup>(1)</sup>	0.01	39.4 <sup>(2)</sup>	01-A-1057-S2
979-G02-P	979-G02-U	40% <sup>(1)</sup>	0.01		01-A-1059-S2
979-G03-P	979-G03-U	40% <sup>(1)</sup>	0.01		01-A-1062-S2
979-G04-P	979-G04-U	40% <sup>(1)</sup>	0.01		01-A-1063-S2
979-G05-P	979-G05-U	40% <sup>(1)</sup>	0.01		01-A-1064-S2
979-G06-P	979-G06-U	40% <sup>(1)</sup>	0.01		01-A-1065-S2
973-G01-P	973-G01-P	40% <sup>(1)</sup>	0.01		21-A-3999

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).



<sup>(2)</sup> Bubble Limit of 39.4 tons per rolling 12-month period for the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-P ( EP 979-G01-P, EP 979-G02-P, EP 979-G03-P, EP 979-G04-P, EP 979-G05-P, EP 979-G06-P, and EP 973-G01-P).

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

Limits & Requirements for EP 979-G01-P, EP 979-G02-P, EP 979-G03-P, EP 979-G04-P, EP 979-G05-P, EP 979-G06-P:

### **Operating Limits**

Process throughput:

- A. The permittee shall not utilize more than 3,940,200 pounds of adhesive in these emission units per 12-month rolling period (which is equivalent to 39.4 tons VOC per rolling 12-month period) based on a maximum free VOC/HAP content of 2%. This bubble limit shall apply to the following glue machines located at the Winnebago Forest City operations: EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, EP-979-G05-P, & EP-979-G06-P.
- B. The percentage of free MDI shall be determined following the “MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry” (a copy of which is attached to the permit).
- C. If the adhesive material as applied contains additional VOC/HAP components, the permittee shall estimate that 100% of that component is emitted. These additional VOC/HAP components shall be counted toward the 39.4 Ton per year VOC limit.

### **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The permittee shall record the quantity of adhesive used in the following hot glue machines EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, EP-979-G05-P, and EP-979-G06-P on a rolling 12-month basis.
- B. The permittee shall record the amount of free VOC/HAP content of the adhesive utilized in the following hot glue machines EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, EP-979-G05-P, and EP-979-G06-P.
- C. The permittee shall record the amount of MDI, free VOC/HAP, and additional VOC/HAP components compared to the 39.4 ton per year limit, on a rolling 12-month basis.

Authority for Requirement: DNR Construction Permits referenced in Table D-2

Requirements & Limits for EP 973-G01-P:

- A. The owner or operator shall maintain the control equipment (Panel Filters CE 973-G01) in accordance with the manufacturer's specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance conducted on the control equipment. This record shall include, but is not limited to:
  - a. The date any inspection and/or maintenance was performed on the control equipment;
  - b. Any issues identified during the inspection; and,
  - c. Any issues addressed during the maintenance activities.

**NESHAP Subpart MMMM – Specific Monitoring & Recordkeeping**

- A. The owner or operator shall demonstrate compliance with the NESHAP Subpart MMMM emission limits 40 CFR §63.3890 by following the compliance options detailed in 40 CFR §63.3891.
  - a. The owner or operator shall record the compliance option it is using from 40 CFR §63.3891; and,
  - b. The owner or operator shall update the record, including date, should the compliance option change.
- B. The owner or operator shall demonstrate compliance with the NESHAP Subpart MMMM requirements by following the procedures detailed in 40 CFR §63.3941 & 40 CFR §63.3942, 40 CFR §63.3951 & 40 CFR §63.3952, or 40 CFR §63.3961 & 40 CFR §63.3963.
- C. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.3920.
- D. All applicable NESHAP Subpart MMMM requirements not specifically outlined in this permit still apply.

**NESHAP Subpart PPPP – Specific Monitoring & Recordkeeping**

- E. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP emission limits 40 CFR §63.4490 by following the compliance options detailed in 40 CFR §63.4491.
  - a. The owner or operator shall record the compliance option it is using from 40 CFR §63.4491; and,
  - b. The owner or operator shall update the record, including date, should the compliance option change.
- F. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP requirements by following the procedures detailed in 40 CFR §63.4541 & 40 CFR §63.4542, 40 CFR §63.4551 & 40 CFR §63.4552, or 40 CFR §63.4561 & 40 CFR §63.4563.
- G. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.4520.

H. All applicable NESHAP Subpart P PPP requirements not specifically outlined in this permit still apply.

**VOC Monitoring & Recordkeeping Requirements**

- I. The total amount of Volatile Organic Compounds (VOC) emissions from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U, shall not exceed 39.4 tons in any 12-month rolling period. The owner or operator shall:
- a. On a monthly basis, calculate and record the total amount of VOC emissions, in tons, from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U, for the previous month.
  - b. On a monthly basis, calculate and record the rolling 12-month total amount of VOC emissions, in tons, from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U.
  - c. The amount of VOC emitted shall be calculated by using the following equation:

$$VOC\ Emissions = \sum_{i=1}^n \left[ (MA_i * VOC_i + MDI_i) * \left( \frac{ton}{2000\ lb} \right) \right]$$

Where: *MA* = Adhesive material throughput, lb  
*VOC* = Adhesive VOC weight % (as applied, excluding MDI)  
*MDI* = MDI emissions, as calculated by following the “MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry” (a copy of which is attached to the permit), lb

- J. If the 12-month rolling total of VOC emitted exceeds 31.5 tons, the owner or operator shall immediately begin keeping the following daily records:
- a. The amount of emissions of VOC from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U, in tons.
  - b. The 365-day rolling total of the amount of emissions of VOC from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U, in tons.

Daily calculations of VOC emissions shall continue until the 365-day rolling total of the amount of emissions of VOC from the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U drops below 31.5 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of emissions of VOC will cease per Condition 5.K. of this permit. If the emissions once again exceed 31.5 tons, daily recordkeeping will be required per Condition 5.K. of this permit.

- K. The owner or operator shall maintain a daily record of the adhesive utilized in the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U. The record shall contain the following information:
  - a. For all materials, the material name; and,
  - b. For all materials, the VOC/HAP content (as applied) in percentage.
  - c. For the purposes of calculating emissions, all VOC or HAP may be considered emitted on the day the materials are delivered to the facility or to the production line.
  
- L. The owner or operator shall maintain a Safety Data Sheet (SDS), Certified Product Data Sheet (CPDS), or similar document for each adhesive utilized in the following hot glue machines: EU 979-G01-U, EU 979-G02-U, EU 979-G03-U, EU 979-G04-U, EU 979-G05-U, EU 979-G06-U, and EU 973-G01-U, showing the VOC/HAP content for each. These records shall be maintained on-site and readily available for inspection by the DNR.

Authority for Requirement: DNR Construction Permit 21-A-399

**NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

This emission point is also subject to 40 CFR 63 Subpart P National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts & Products.

Authority for Requirement: DNR Construction Permit 21-A-399

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

**Table D-3**

Table D-3			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
979-G01-P	979-G01-U	01-A-1057-S2	30	Downward	8	Ambient	500
979-G02-P	979-G02-U	01-A-1059-S2	30	Downward	8	Ambient	500
979-G03-P	979-G03-U	01-A-1062-S2	36	Downward	8	Ambient	500
979-G04-P	979-G04-U	01-A-1063-S2	38	Downward	8	Ambient	500
979-G05-P	979-G05-U	01-A-1064-S2	38	Downward	8	Ambient	500
979-G06-P	979-G06-U	01-A-1065-S2	36	Downward	8	Ambient	500
973-G01-P	973-G01-P	21-A-399	26.83	Downward	8	Ambient	500

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table E-1 – Glue Operations – Sawmill Roll Applicators**

Associated Equipment

**Table E-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity
981-G04-P	981-G04-U	Sawmill Glue Machine Exhaust Stack - Roll Applicator	Adhesive	1.94 gallons/hr

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table E-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table E-2**

Emission Point ID	Emission Unit ID	VOC (tons/yr)	DNR Construction Permit
981-G04-P	981-G04-U	39.0	96-A-761-S2

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

Process throughput:

- A. The VOC content of any adhesive used in the process (Sawmill Glue Machine EP 981-G04-P) shall not exceed 1.0 pounds of VOC per gallon.
- B. The permittee shall not utilize more than 78,000 gallons of adhesive in this process (Sawmill Glue Machine EP 981-G04-P) per 12-month rolling period (which is equivalent to 39.0 tons VOC per rolling 12-month period).

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The permittee shall monthly record the quantity of adhesive used in the process (Sawmill Glue Machine EP 981-G04-P) and monthly calculate the rolling 12-month total.
- B. The permittee shall record the VOC content of any adhesive used in this process (Sawmill Glue Machines EP 981-G04-P), in pounds per gallon.

Authority for Requirement: DNR Construction Permit 96-A-761-S2

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

Table E-3		Stack Characteristics					
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
981-G04-P	984-G04-U	96-A-761-S1	27.4	Vertical Unobstructed	18	70	4,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table F-1b - Ovens**

Associated Equipment

**Table F-1b**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity
977-O10-P	977-O10-U	Electrocoat Bake Oven Zone 2	Natural Gas	3.0 MMBtu/hr
977-O11-P	977-O11-U	Electrocoat Bake Oven Zone 1	Natural Gas	2.0 MMBtu/hr
977-O12-P	977-O12-U	Powder Coat Bake Oven (IR)	Electricity	(72) 2000 Watt Elements
977-O14-P	977-O14-U	Powder Coat Bake Oven Cure	Natural Gas	3.0 MMBtu/hr

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table F-1b.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table F-2b**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM (gr/dscf) 567 IAC 23.3(2)"a"	Sulfur Dioxide (SO <sub>2</sub> ) (ppmv) 567 IAC 23.3(3)"e"	DNR Construction Permit
977-O10-P	977-O10-U	40%	0.1	500	Exempt
977-O11-P	977-O11-U	40%	0.1	500	Exempt
977-O12-P	977-O12-U	40%	0.1	NA	Exempt
977-O14-P	977-O14-U	40%	0.1	500	Exempt

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 22.108(3)



**Emission Point ID: See Table F-1c - Ovens**

Associated Equipment

**Table F-1c**

<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Raw Material/ Fuel</b>	<b>Rated Capacity</b>
990-O03-P	990-O03-U	Powder Paint Cure Oven Combustion Exhaust	Natural Gas	4.0 MMBtu/hr
	990-O04-U	Powder Paint Cure Oven VOC Exhaust	Powder Paint	5.0 gallons/hr

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table F-1c.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 96-A-1293-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup>An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 96-A-1293-S2  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: DNR Construction Permit 96-A-1293-S2  
567 IAC 23.3(2)"e"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 16.9 tons/yr

Authority for Requirement: DNR Construction Permit 96-A-1293-S2  
567 IAC 23.3(2)"e"

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

- A. The amount of material used in this emissions unit shall not exceed 260,000 pounds in any rolling twelve-month period.
- B. The VOC content of any material used in this emissions unit shall not exceed 13% by weight.
- C. The oven shall be fired by natural gas or LPG at a maximum heat input of 4.0 MMBTU/hr.

Authority for Requirement: DNR Construction Permit 96-A-1293-S2

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

The permittee shall maintain the following monthly records:

- A. The identification of any material used in the emissions unit.
- B. The VOC content of any material used in the emissions unit (percent by weight).
- C. The total amount of material used in the emissions unit (pounds).
- D. The rolling 12-month total of the amount of material used in the emission unit (pounds).

Authority for Requirement: DNR Construction Permit 96-A-1293-S2

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

Table F-3c			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
990-O03-P	990-O03-U	96-A-1293-S2	33.8	Vertical Obstructed	16	425	4,200
	990-O04-U						

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table G-1 - Cutting/Grinding/Stripping**

Associated Equipment

**Table G-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
973-P06-P	973-P06-U	Plastic Grinder	Plastic Beads	1400 lb/hr	973-P06-C	Cyclone
978-P01-P	978-P01-U	Laser Cutting Machine	Sheet Steel	11.25 in <sup>3</sup> /hr	None	None
978-P03-P	978-P03-U	Laser Cutting Machine	Sheet Steel	11.25 in <sup>3</sup> /hr	None	None
978-P04-P	978-P04-U	Laser Cutting Machine	Sheet Steel	11.25 in <sup>3</sup> /hr	None	None
991-P01-P	991-P01-U	CAPCO Extrusion Line Die Strip Tank Exhaust	Caustic Soda	8.33 lb/hr	None	None

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table G-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table G-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.3(2)"a"	PM (lb/hr)	DNR Construction Permit
973-P06-P	973-P06-U	40% <sup>(2)</sup>	NA	0.1	1.0	04-A-555
978-P01-P	978-P01-U	40% <sup>(4)</sup>	NA	0.1	NA	98-A-206
978-P03-P	978-P03-U	40% <sup>(2)</sup>	0.6	0.1	0.6	99-A-408-S1
978-P04-P	978-P04-U	40% <sup>(3)</sup>	0.082	0.1	NA	00-A-641-S2
991-P01-P	991-P01-U	40% <sup>(1)</sup>	NA	0.1	NA	96-A-701-S2

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(3)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(4)</sup> If visible emissions are observed that exceed the values obtained during the initial compliance test, a stack test may be required to further determine compliance.

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Operating Limits**

For Emission Unit 973-P06-U

Control equipment parameters:

A. All control equipment shall be maintained according to the manufacturer's specifications.

Authority for Requirement: DNR Construction Permit 04-A-555

#### **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

For Emission Unit 973-P06-U

A. The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were the result of the inspections.

Authority for Requirement: DNR Construction Permit 04-A-555

### **Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

			<b>Stack Characteristics</b>				
<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Construction Permit</b>	<b>Stack Height (ft. from the ground)</b>	<b>Discharge Style</b>	<b>Stack Opening (inches, dia.)</b>	<b>Exhaust Temp. (°F)</b>	<b>Exhaust Flowrate (scfm)</b>
973-P06-P	973-P06-U	04-A-555	27	Vertical Unobstructed	8	80	3,700
978-P01-P	978-P01-U	98-A-206	26	Vertical Unobstructed	18	Ambient	3,500
978-P03-P	978-P03-U	99-A-408-S1	25	Vertical Unobstructed	18	70	3,500
978-P04-P	978-P04-U	00-A-641-S2	28	Vertical Unobstructed	18	Ambient	3,500
991-P01-P	973-P06-U	96-A-701-S2	32	Vertical Unobstructed	12	70	800

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the

temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table I-1 – Customer Service Booths**

Associated Equipment

**Table I-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
970-S01-P	970-S01-U	Customer Service Dry Filter Paint Booth – West Stack	Paint and Solvents	22 lb/hr	970-S01-C	Dry Filters
970-S02-P		Customer Service Dry Filter Paint Booth – East Stack				
970-S03-P	970-S03-U	Customer Service Dry Filter Adhesive Booth – North Stack	Adhesives	7.5 gal/hr	970-S03-C	Dry Filters
970-S04-P		Customer Service Dry Filter Adhesive Booth – South Stack				
970-S05-P	970-S05-U	Customer Service Cabinet Bench Stain Spray Booth	Clearcoat and Stains	1.875 gal/hr	970-S05-C	Dry Filters

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table I-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table I-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d "	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.4(13)	PM (lb/hr)	VOC (tons/yr)	DNR Construction Permit
970-S01-P	970-S01-U	40% <sup>(1)</sup>	1.6	0.01	NA	27.0 <sup>(3)</sup>	90-A-062-S3
970-S02-P		40% <sup>(1)</sup>	1.6	0.01	NA		99-A-307-S2
970-S03-P	970-S03-U	40% <sup>(2)</sup>	0.63	0.01	0.63	4.95 <sup>(4)</sup>	02-A-038-S2
970-S04-P		40% <sup>(2)</sup>	0.63	0.01	0.63		02-A-039-S2
970-S05-P	970-S05-U	40% <sup>(2)</sup>	0.34	0.01	NA	NA	02-A-040-S3

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(3)</sup> Combined VOC limit for EP 970-S01 and EP 970-S02.

<sup>(4)</sup> Total VOC PTE for EP 970-S03-P and EP 970-S04-P.

## **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Operating Limits**

Process throughput:

For Emission Points 970-S01-P and 970-S02-P

1. The amount of material sprayed in the Customer Service Building Paint Booth shall not exceed 7,700 gallons per twelve month rolling period, rolled monthly.
2. The VOC content of any material sprayed in the Customer Service Building Paint Booth shall not exceed 7.0 pounds per gallon, as applied.
3. The solids content of any material sprayed in the Customer Service Building Paint Booth shall not exceed 7.0 pounds per gallon, as applied.
4. The permittee shall maintain the paint booth's filters according to the manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permits 90-A-062-S3, 99-A-307-S2

For Emission Points 970-S03-P and 970-S04-P

1. The solids content of the as-sprayed material is limited to 1.90 pounds per gallon.
2. The VOC content of the as-sprayed material is limited to 5.50 pounds per gallon.
3. Total material usage for EP 970-S03-P and 970-S04-P shall not exceed 1,800 gallons per rolling 12-month period.
4. This paint booth is limited to the spraying or operation of one paint gun at any time.

Authority for Requirement: DNR Construction Permits 02-A-038-S2, 02-A-039-S2

For Emission Point 970-S05-P

1. A maximum of one spray gun shall be operated in the Customer Service Cabinet Bench Booth at any one time.
2. The Customer Service Cabinet Bench Booth is limited to 1,340 gallons, as sprayed, of VOC-containing material such as paints and solvents per rolling 12-month period.
3. The VOC content of the material used in the Customer Service Cabinet Bench Booth shall not exceed 9.0 lb/gal as sprayed.
4. The solids content of the material used in the Customer Service Cabinet Bench Booth shall not exceed 7.0 lb/gal as sprayed.
5. The owner or operator shall comply with all applicable requirements from 40 CFR Part 63, Subpart JJ.
6. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permit 02-A-040-S3



## **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:*

For Emission Points 970-S01-P and 970-S02-P

1. For each batch of material that is intended to be used in the Customer Service Building Paint Booth which is a mixture of multiple components, the following items must be recorded:
  - a. The identification of each component of any mixture of materials to be sprayed.
  - b. The quantity of each component added to the mixture recorded to the nearest 0.1 gallons.
  - c. The calculated VOC content for each mixture. This value must be calculated by multiplying the quantity of each component recorded as required under (b) above by the VOC content in pounds per gallon of that particular component. After the VOC contribution from each component has been calculated, the total amount of VOC in the mixture must be calculated by summing the VOC contribution from each component. The as applied VOC content can then be calculated by dividing the total VOC in the mixture by the total volume of the mixture prepared.
  - d. The calculated solids content for each mixture. This value must be calculated by multiplying the quantity of each component recorded as required under (b) above by the solids content in pounds per gallon of that particular component. After the solids contribution from each component has been calculated, the total amount of solids in the mixture must be calculated by summing the solids contribution from each component. The as applied solids content can then be calculated by dividing the total solids in the mixture by the total volume of the mixture prepared.
2. Maintain MSDS or other product documentation for all materials sprayed, whether the material is used as a component of a mixture or is sprayed as it was received. This documentation must show the VOC content and solids content of each material used in the spray booth.
3. At the end of each month, record the total volume, in gallons, of material that was sprayed in this booth over the previous month.
4. At the end of each month, record the total volume, in gallons, of material that was sprayed in this booth over the previous twelve (12) months.
5. Maintain a log of all maintenance and replacement of the filters used in this booth

Authority for Requirement: DNR Construction Permits 90-A-062-S3, 99-A-307-S2

For Emission Points 970-S03-P and 970-S04-P

1. Retain Material Safety Data Sheets (MSDS) of adhesives used in the Adhesive Application Spray Booth.
2. Record the quantity of adhesive and solvent used in a rolling 12-month period.
3. Maintain records documenting maintenance of control equipment.

Authority for Requirement: DNR Construction Permits 02-A-038-S2, 02-A-039-S2

For Emission Point 970-S05-P

1. Record monthly the amount of VOC-containing material used in the Customer Service Cabinet Bench Booth. Calculate and record 12-month rolling totals.
2. Retain Safety Data Sheets (SDS) for all materials used in the Customer Service Cabinet Bench Booth.
3. The owner or operator shall record the compliance option being used by the facility to show compliance with Subpart JJ. If applicable, the permittee shall also record the date the facility switches compliance options.
4. The owner or operator shall maintain a record of all control equipment inspections and maintenance, and any action resulting from the inspection/maintenance of the control equipment and monitoring devices.

Authority for Requirement: DNR Construction Permit 02-A-040-S3  
 567 IAC 23.1(4)"aj"  
 40 CFR 63 Subpart JJ

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

			<b>Stack Characteristics</b>				
<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Construction Permit</b>	<b>Stack Height (ft. from the ground)</b>	<b>Discharge Style</b>	<b>Stack Opening (inches, dia.)</b>	<b>Exhaust Temp. (°F)</b>	<b>Exhaust Flowrate (scfm)</b>
970-S01-P	970-S01-U	90-A-062-S2	29	Vertical Unobstructed	42	70	19,440
970-S02-P		99-A-307-S1	29	Vertical Unobstructed	42	70	19,440
970-S03-P	970-S03-U	02-A-038-S2	27	Vertical Unobstructed	24	Ambient	7,400
970-S04-P		02-A-039-S2	27	Vertical Unobstructed	24	Ambient	7,400
970-S05-P	970-S05-U	02-A-040-S3	24	Vertical Unobstructed	18	Ambient	4,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

*Required for 970-S01-C, 970-S03-C, & 970-S05-C*

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Spray Booth Filter Agency Operation & Maintenance Plan**

**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and be available upon request.

**Quality Control**

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table J-1 – Van Conversion Paint Line**

Associated Equipment

**Table J-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
973-S01-P	973-S01-U	East Van Shop Paint Booth	Paint and Solvents	7.5 gallons/hr	973-S01-C	Panel Filters
973-S02-P	973-S02-U	West Van Shop Paint Booth	Paint and Solvents	7.5 gallons/hr	973-S02-C	Panel Filters

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table J-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table J-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.4(13)	PM (lb/hr)	VOC (tons/yr)	DNR Construction Permit
973-S01-P	973-S01-U	40% <sup>(1)</sup>	0.62	0.01	0.62	27.6 <sup>(2)</sup>	92-A-657-S5
973-S02-P	973-S02-U	40% <sup>(1)</sup>	0.62	0.01	0.62		92-A-658-S5

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Total VOC PTE for EP 973-S01 & EP 973-S02

**Operating Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

- A. The owner or operator shall maintain a record of the materials sprayed in the East Van Shop Paint Booth (EU 973-S01-U) and West Van Shop Paint Booth (EU 973-S02-U). The record shall contain the following information:
  - (1) For all materials, the material name; and,
  - (2) For all materials, the VOC content (as applied) in lb/gal.
  
- B. The owner or operator shall maintain a Safety Data Sheet (SDS), Certified Product Data Sheet (CPDS), or similar document for each coating material used in the East Van Shop Paint Booth (EU 973-S01-U) and West Van Shop Paint Booth (EU 973-S02-U), showing

the VOC content for each. These records shall be maintained on-site and readily available for inspection by the DNR.

- C. The owner or operator shall maintain the control equipment (Dry Filters CE 973-S01-C and CE 973-S02-C) in accordance with the manufacturer's specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance conducted on the control equipment. This record shall include, but is not limited to:
  - (1) The date any inspection and/or maintenance was performed on the control equipment;
  - (2) Any issues identified during the inspection; and,
  - (3) Any issues addressed during the maintenance activities.

**NESHAP Subpart MMMM – Specific Monitoring & Recordkeeping**

- D. The owner or operator shall demonstrate compliance with the NESHAP Subpart MMMM emission limits 40 CFR §63.3890 by following the compliance options detailed in 40 CFR §63.3891.
  - (1) The owner or operator shall record the compliance option it is using from 40 CFR §63.3891; and,
  - (2) The owner or operator shall update the record, including date, should the compliance option change.
- E. The owner or operator shall demonstrate compliance with the NESHAP Subpart MMMM requirements by following the procedures detailed in 40 CFR §63.3941 & 40 CFR §63.3942, 40 CFR §63.3951 & 40 CFR §63.3952, or 40 CFR §63.3961 & 40 CFR §63.3963.
- F. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.3920.
- G. All applicable NESHAP Subpart MMMM requirements not specifically outlined in this permit still apply.

**NESHAP Subpart PPPP – Specific Monitoring & Recordkeeping**

- H. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP emission limits 40 CFR §63.4490 by following the compliance options detailed in 40 CFR §63.4491.
  - (1) The owner or operator shall record the compliance option it is using from 40 CFR §63.4491; and,
  - (2) The owner or operator shall update the record, including date, should the compliance option change.
- I. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP requirements by following the procedures detailed in 40 CFR §63.4541 & 40 CFR §63.4542, 40 CFR §63.4551 & 40 CFR §63.4552, or 40 CFR §63.4561 & 40 CFR §63.4563.

- J. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.4520.
- K. All applicable NESHAP Subpart PPPP requirements not specifically outlined in this permit still apply.

**VOC Monitoring & Recordkeeping Requirements**

- L. The combined total amount of all coating materials (i.e., coatings, solvents, etc.) used in the East Van Shop Paint Booth (EU 973-S01-U) and West Van Shop Paint Booth (EU 973-S02-U) shall not exceed 7,360 gallons per rolling twelve-month period.
  - (1) On a monthly basis, the owner or operator shall calculate and record the monthly total and the 12-month rolling total amount of VOC-containing coating materials applied in the East Van Shop Paint Booth (EU 973-S01-U) and West Van Shop Paint Booth (EU 973-S02-U), in applicable units.
  - (2) For calculating monthly totals for these emission units, all materials may be considered emitted on the day they are delivered to the plant or pulled from the warehouse (i.e., purchase records, 55-gallon drum, etc.).
- M. The Volatile Organic Compound (VOC) content of the coating materials utilized in the East Van Shop Paint Booth (EU 973-S01-U) and West Van Shop Paint Booth (EU 973-S02-U) shall not exceed 7.5 pounds per gallon.

Authority for Requirement: DNR Construction Permits referenced in Table J-2  
567 IAC 23.1(4)"cm"  
40 CFR 63 Subpart M MMM  
567 IAC 23.1(4)"cp"  
40 CFR 63 Subpart P PPP

**NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart M MMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

This emission point is also subject to 40 CFR 63 Subpart P PPP National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts & Products.

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

Table J-3			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
973-S01-P	973-S01-U	92-A-657-S5	30	Vertical Unobstructed	42	70	17,500
973-S02-P	973-S02-U	92-A-658-S5	30	Vertical Unobstructed	42	70	17,500

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

*Required for CE 973-S01-C and 973-S01-C*

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

<b><u>Spray Booth Filter Agency Operation &amp; Maintenance Plan</u></b>
<p><b>Weekly</b> Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.</p>
<p><b>Record Keeping and Reporting</b> Maintenance and inspection records will be kept for five years and be available upon request.</p>
<p><b>Quality Control</b> The filter equipment will be operated and maintained according to the manufacturer's recommendations.</p>

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID: 973-S05-P - Van Shop Surface Preparation**

### Associated Equipment

Associated Emission Unit ID Number: 973-S05-U  
Emissions Control Equipment ID Number: 973-S05-C  
Emissions Control Equipment Description: Fiberglass Filters

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### **Applicable Requirements**

Emission Unit vented through this Emission Point: 973-S05-U  
Emission Unit Description: Van Shop Surface Preparation Booth  
Raw Material/Fuel: Fiberglass Parts  
Rated Capacity: 17,000 scfm/hr

#### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 96-A-088-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.85 lb/hr

Authority for Requirement: DNR Construction Permit 96-A-088-S2

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 96-A-088-S2  
567 IAC 23.3(2)"a"



**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

Control equipment parameters:

- A. The control equipment shall be inspected and maintained according to manufacturer's recommendations.

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: DNR Construction Permit 96-A-088-S2

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 29.5

Stack Opening, (inches, dia.): 34

Exhaust Flow Rate (scfm): 17,000

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 96-A-088-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID: Custom Shells Booths

### Associated Equipment

**Table: Custom Shells Booths**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
984-S03-P	984-S03-P	Custom Shells Booth #1	Coating Materials	7.5 gallons/hr	984-S03-C	Dry Filters
984-S04-P	984-S04-P	Custom Shells Booth #2	Coating Materials	7.5 gal/hr	984-S04-C	Dry Filters

Raw Material/Fuel: Coating Materials

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### **Applicable Requirements**

#### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

#### For Each Emission Point

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 19-A-443-S2 & 19-A-444-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permits 19-A-443-S2 & 19-A-444-S2  
567 IAC 23.4(13)

#### For Both Emission Points

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 8 tons/yr

Authority for Requirement: DNR Construction Permits 19-A-443-S2 & 19-A-444-S2

### **Operational Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The owner or operator shall maintain a record of the materials sprayed in the Custom Shells Booth #1 (EU 984-S03-U) and Custom Shells Booth #2 (EU 984-S04-U). The record shall contain the following information:
  - (1) For all materials, the material name; and,
  - (2) For all materials, the VOC content (as applied) in lb/gal.
  
- B. The owner or operator shall maintain a Safety Data Sheet (SDS), Certified Product Data Sheet (CPDS), or similar document for each coating material used in the Custom Shells Booth #1 (EU 984-S03-U) and Custom Shells Booth #2 (EU 984-S04-U), showing the VOC content for each. These records shall be maintained on-site and readily available for inspection by the DNR.
  
- C. The owner or operator shall maintain the control equipment (Dry Filters, CE 984-S03-C and CE 984-S04-C) in accordance with the manufacturer's specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance conducted on the control equipment. This record shall include, but is not limited to:
  - (1) The date any inspection and/or maintenance was performed on the control equipment;
  - (2) Any issues identified during the inspection; and,
  - (3) Any issues addressed during the maintenance activities.

### **NESHAP Subpart JJ – Specific Monitoring & Recordkeeping**

- D. In accordance with 40 CFR §63.803, the owner or operator shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards detailed in 40 CFR §63.803(b) - 40 CFR §63.803(l). The written work practice implementation plan shall be available for inspection by the Department upon request. If the Department determines the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Department may require the owner or operator to modify the plan.
  
- E. The owner or operator shall demonstrate compliance with the NESHAP Subpart JJ requirements of Table 3 by following the procedures detailed in 40 CFR §63.804.
  - a. The owner or operator shall record the compliance option it is using from 40 CFR §63.804(a); and,
  - b. The owner or operator shall update the record, including date, should the compliance option change.
  
- F. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.807.

- G. All applicable NESHAP Subpart JJ requirements not specifically outlined in this permit still apply.

**NESHAP Subpart PPPP – Specific Monitoring & Recordkeeping**

- H. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP emission limits 40 CFR §63.4490 by following the compliance options detailed in 40 CFR §63.4491.
  - (1) The owner or operator shall record the compliance option it is using from 40 CFR §63.4491; and,
  - (2) The owner or operator shall update the record, including date, should the compliance option change.
- I. The owner or operator shall demonstrate compliance with the NESHAP Subpart PPPP requirements by following the procedures detailed in 40 CFR §63.4541 & 40 CFR §63.4542, 40 CFR §63.4551 & 40 CFR §63.4552, or 40 CFR §63.4561 & 40 CFR §63.4563.
- J. The owner or operator shall meet all applicable reporting requirements as required by 40 CFR §63.4520.
- K. All applicable NESHAP Subpart PPPP requirements not specifically outlined in this permit still apply.

**VOC Monitoring & Recordkeeping Requirements**

- L. The combined total amount of all coating materials (i.e., adhesive, coatings, solvents, etc.) used in the Custom Shells Booth #1 (EU 984-S03-U) and Custom Shells Booth #2 (EU 984-S04-U) shall not exceed 2,000 gallons per rolling twelve-month period.
  - (1) On a monthly basis, the owner or operator shall calculate and record the monthly total and the 12-month rolling total amount of VOC-containing coating materials applied in the Custom Shells Booth #1 (EU 984-S03-U) and Custom Shells Booth #2 (EU 984-S04-U), in applicable units.
  - (2) For calculating monthly totals for these emission units, all materials may be considered emitted on the day they are delivered to the plant or pulled from the warehouse (i.e., purchase records, 55-gallon drum, etc.).
- M. The Volatile Organic Compound (VOC) content of the coating materials utilized in the Custom Shells Booth #1 (EU 984-S03-U) and Custom Shells Booth #2 (EU 984-S04-U) shall not exceed 8.0 pounds per gallon.

Authority for Requirement: DNR Construction Permits 19-A-443-S2 & 19-A-444-S2

**NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart JJ National Emission Standards for Wood Furniture Manufacturing Operations.

This emission point is also subject to 40 CFR 63 Subpart P National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts & Products.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Table: CSB Emission Point Characteristics			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft. from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
984-S03-P	984-S03-P	19-A-443-S2	35	Vertical Unobstructed	18	70	4,000
984-S04-P	984-S04-P	19-A-444-S2	35	Vertical Unobstructed	24	70	7,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

<p style="text-align: center;"><b><u>Spray Booth Filter Agency Operation &amp; Maintenance Plan</u></b></p> <p><u>For Both Emission Points</u></p> <p><b>Weekly</b> Inspect the spray booth systems for conditions that reduce the operating efficiency of the collection systems. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.</p> <p><b>Record Keeping and Reporting</b> Maintenance and inspection records will be kept for five years and be available upon request.</p> <p><b>Quality Control</b> The filter equipment will be operated and maintained according to the manufacturer's recommendations.</p>
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Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table L-1 – Fiberglassing Booths**

Associated Equipment

**Table L-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
982-S08-P	982-S08-U	Tooling Resin Spray Booth	Fiberglass Gelcoats and Polyester Resins	1.0 gallons/hr	982-S08-C	Dry Filters
982-S09-P					982-S09-C	Dry Filters
982-S11-P	982-S11-U	Fiberglass Chop Booth	Resin and Catalyst	2,412 lb/hr	982-S11-C	Dry Filters
982-S12-P					982-S12-C	Dry Filters
982-S13-P					982-S13-C	Dry Filters
982-S14-P	982-S14-U	Gelcoat Booth	Gelcoat and Catalyst	185 lb/hr	982-S14-C	Dry Filters

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table L-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table L-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2) "d"	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.4(13)	PM (lb/hr)	VOC (tons/yr)	Total HAP	DNR Construction Permit
982-S08-P	982-S08-U	40% <sup>(1)</sup>	0.40	0.01	0.40	8.7 <sup>(3)</sup>		96-A-092-S5
982-S09-P		40% <sup>(1)</sup>	0.40	0.01	0.40			96-A-090-S2
982-S11-P	982-S11-U	40% <sup>(2)</sup>	0.50	0.01	0.50	85.0 <sup>(4)</sup>	88 lb/ton resin <sup>(5)</sup>	09-A-489-P3
982-S12-P		40% <sup>(2)</sup>	0.50	0.01	0.50			09-A-490-P3
982-S13-P		40% <sup>(2)</sup>	0.50	0.01	0.50			09-A-491-P3
982-S14-P	982-S14-U	40% <sup>(2)</sup>	0.80	0.01	0.80		267 lb/ton white/off white gel coat <sup>(6)</sup> or 377 lb/ton other pigmented gel coat <sup>(7)</sup>	09-A-492-P3

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the



exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(3)</sup> Combined emission limit for 982-S08-P and 982-S09-P.

<sup>(4)</sup> Combined VOC limit requested by permittee for Chop Spray Booth EP-982-S11, EP-982-S12, EP-982-S13, and Gel coat booth EP-982-S14.

<sup>(5)</sup> This emission limit is for the open molding application of non-corrosion-resistant and/or high strength (CR/HS) resins as specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW – Reinforced Plastics Composite Production (40 CFR §63.5780 through 40 CFR §63.5980).

<sup>(6)</sup> This emission limit is for the open molding application of white and off-white pigmented gel coating as specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW – Reinforced Plastics Composite Production (40 CFR §63.5780 through 40 CFR §63.5980). This standard is expressed as a 12-month rolling average and includes periods of startup, shutdown and malfunction.

<sup>(7)</sup> This emission limit is for the open molding application of all other pigmented gel coating as specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart WWWW – Reinforced Plastics Composite Production (40 CFR §63.5780 through 40 CFR §63.5980). This standard is expressed as a 12-month rolling average and includes periods of startup, shutdown and malfunction.

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Operating Limits**

#### **EP's 982-S08-P & 982-S09-P**

- A. The amount of resin and gel coat used in this emissions unit shall not exceed 63,704 pounds in any monthly rolling 12-month period.
- B. The VOC content of any combination of resin and gel coat used in the Tooling Resin Spray Booth shall not exceed 540 pounds per ton of material used.
- C. Emissions of organic HAP for mechanical tooling resin application shall not exceed 254 lbs per ton of material used as calculated using the procedures in 40 CFR §63.5810.
- D. Emissions of organic HAP for tooling gel coat application shall not exceed 440 lbs per ton of material used as calculated using the procedures in 40 CFR §63.5810.
- E. The amount of organic peroxide catalyst used in the Tooling Resin Spray Booth shall not exceed 3,700 pounds in any monthly rolling 12-month period.
- F. The Tooling Resin Spray Booth shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production.
- G. Manual grinding of formed parts is permitted in the booth.
- H. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permits 96-A-092-S5 & 96-A-090-S2  
567 IAC 23.1(4)"cw"  
40 CFR 63 Subpart WWWW

**EP's 982-S11-P, 982-S12-P, & 982-S13-P**

- A. Emissions of Organic HAP shall not exceed 88 pounds per ton of resin used as calculated using the procedures in 40 CFR§63.5810.
- B. This emission unit shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production.
- C. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permits 09-A-489-P3, 09-A-490-P3,  
09-A-491-P3  
567 IAC 23.1(4)"cw"  
40 CFR 63 Subpart WWWW

**EP 982-S14-P**

- A. Emissions of Organic HAP shall not exceed 267 pounds per ton of white/off white gel coat used and 377 pounds per ton of other pigmented gel coat used, as calculated using the procedures in 40 CFR§63.5810.
- B. This emission unit shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production.
- C. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permit 09-A-492-P3  
567 IAC 23.1(4)"cw"  
40 CFR 63 Subpart WWWW

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

**EP's 982-S08-P & 982-S09-P**

- A. The permittee shall maintain the following monthly records:
  - 1. The identification of any material used in the Tooling Resin Spray Booth.
  - 2. The VOC and the organic HAP content of any resin and gel coat used in the Tooling Resin Spray Booth.
  - 3. The amount of resin and gel coat used in the Tooling Room Spray Booth in pounds.
  - 4. The amount of catalyst used in the Tooling Resin Spray Booth in pounds.
  - 5. The rolling 12-month total of the amount of resin and gel coat used in the Tooling Resin Spray Booth in pounds.
  - 6. The rolling 12-month total of the amount of organic peroxide catalyst used in the Tooling Resin Spray Booth in pounds.
  - 7. The VOC and the organic HAP emission rate (tons). The emissions from mechanical resin and spray gel coat application shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63, Subpart WWWW, National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emissions of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the resin and gel coat are organic HAPs. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted in the Tooling Resin Spray Booth.
  - 8. The rolling 12-month total of the VOC and the organic HAP emissions in tons.

- B. The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart WWWW. If applicable, the permittee shall also record the date that the facility switches compliance options.
- C. Retain Material Safety Data Sheets (MSDS) for all material used in the Tooling Resin Spray Booth.
- D. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and the monitoring devices.

Authority for Requirement: DNR Construction Permits 96-A-092-S5 & 96-A-090-S2  
567 IAC 23.1(4)"cw"  
40 CFR 63 Subpart WWWW

**EP's 982-S11-P, 982-S12-P, 982-S13-P, 982-S14-P**

- A. Record the following monthly:
1. The VOC emission rate for all resins, gel coat, and catalyst used in Fiberglass Chop Booth EU 982-S11 and Gel coat Booth EU 982-S14, in tons. The emissions rate shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emissions of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the resin are organic HAP. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted from the Fiberglass Chop Booths, except in the case of catalysts, where industry standard equations will be utilized to calculate emissions from these materials.
  2. The organic HAP emission rate for all resins used in Fiberglass Chop Booth, EU-982-S11, in pounds per ton. The emissions rate shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations.
  3. The rolling 12-month total of VOC emissions from the Fiberglass Chop Booth EU 982-S11 and Gel coat Booth EU 982-S14, in tons.
- B. A rolling 12-month total of Fiberglass Chop Booth EU 982-S11 and Gel Coat Booth EU 982-S14 VOC emissions shall be kept until the combined VOC emissions from the Chop Booth and Gel Coat Booth exceeds 63 tons.
1. Once the 63 tons of VOC emissions is exceeded, the permittee shall do daily record keeping and implement a rolling 365 day VOC emission total for the chop and gel coat booths.
  2. The permittee may revert back to the monthly record keeping once the daily record keeping is less than 63 ton of VOC emissions for 60 consecutive days.
- C. The MSDS for each gel coat, resin and catalyst material used in the Fiberglass Chop Booth EU 982-S11 and Gel Coat Booth EU 982-S14, showing the VOC content for each, shall be kept on-site and available for inspection by the DNR.
- D. The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart WWWW. If applicable, the permittee shall also record the date that the facility switches compliance options.
- E. The owner or operator shall provide all applicable notifications and reports as required by NESHAP Subpart WWWW, 40 CFR §63.5905 and 40 CFR § 63.5910.
- F. The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were made as a result of the inspections.

Authority for Requirement: DNR Construction Permits 09-A-489-P3, 09-A-490-P3,  
09-A-491-P3, 09-A-492-P3  
567 IAC 23.1(4)"cw"  
40 CFR 63 Subpart WWWW

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

**Table L-3**

			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft from ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate
982-S08-P	982-S08-U	96-A-092-S5	18.5	Downward	34	70	14,150 acfm
982-S09-P		96-A-90-S2	18.5	Downward	34	70	14,150 acfm
982-S11-P	982-S11-U	09-A-489-P3	26.33	Vertical Unobstructed	42	70	19,059 scfm
982-S12-P		09-A-490-P3	26.5	Vertical Unobstructed	42	70	19,059 scfm
982-S13-P		09-A-491-P3	26.67	Vertical Unobstructed	42	70	19,059 scfm
982-S14-P	982-S14-U	09-A-492-P3	26.33	Vertical Unobstructed	42	70	25,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

*Required for 982-S08-C, 982-S09-C, 982-S11-C, 982-S12-C, 982-S13-C, 982-S14-C*

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Spray Booth Filter Agency Operation & Maintenance Plan**

**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and be available upon request.

**Quality Control**

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table M-1 – Full Body Paint Line**

Associated Equipment

**Table M-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Control Equipment ID	Control Equipment Description
987-S02-P	987-S02-U	Full Body Paint – Basecoat Spray Booth	Paint and Solvents	6.563 gallons/hr	987-S02-C	Dry Filters
987-S03-P						
987-S04-P	987-S04-U	Full Body Paint – Clearcoat Spray Booth	Paint and Solvents	6.563 gallons/hr	987-S04-C	Dry Filters
987-S05-P						

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table M-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table M-2**

Emission Point ID	Emission Unit ID	PM <sub>10</sub> (lb/hr)	Opacity 567 IAC 23.3(2)"d"	PM (gr/dscf) 567 IAC 23.4(13)	VOC (tons/yr)	DNR Construction Permit
987-S02-P	987-S02-U	0.50	40% <sup>(1)</sup>	0.01	36.0 <sup>(2)</sup>	11-A-461
987-S03-P		0.50	40% <sup>(1)</sup>	0.01		00-A-601-S1
987-S04-P	987-S04-U	0.50	40% <sup>(1)</sup>	0.01	28.8 <sup>(3)</sup>	98-A-212-S3
987-S05-P		0.50	40% <sup>(1)</sup>	0.01		00-A-602-S2

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Total emissions from EP 987-S02-P and EP 987-S03-P.

<sup>(3)</sup> Total emissions from EP 987-S04-P and EP 987-S05-P.

## **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Operating Limits**

Process Throughput:

#### **For EPs 987-S02-P & 987-S03-P**

- A. The amount of material sprayed in the Full Body Basecoat Spray Booth (EP 987-S02 and EP 987-S03) shall not exceed 10,827 gallons in any rolling twelve-month period.
- B. The VOC content of any material sprayed in the Full Body Basecoat Spray Booth (EP 987-S02 and EP 987-S03) shall not exceed 6.65 pounds per gallon, as applied.
- C. The solids content of any material sprayed in the Full Body Basecoat Spray Booth (EP 987-S02 and EP 987-S03) shall not exceed 6.5 pounds per gallon, as applied.

Authority for Requirement: DNR Construction Permits 11-A-461 & 00-A-601-S1

#### **For EPs 987-S04-P & 987-S05-P**

- A. The amount of material sprayed in the Full Body Clearcoat Spray Booth (EP 987-S04 and EP 987-S05) shall not exceed 9,142 gallons in any rolling twelve-month period.
- B. The VOC content of any material sprayed in the Full Body Clearcoat Spray Booth (EP 987-S04 and EP 987-S05) shall not exceed 6.3 pounds per gallon, as applied.
- C. The solids content of any material sprayed in the Full Body Clearcoat Spray Booth (EP 987-S04 and EP 987-S05) shall not exceed 6.0 pounds per gallon, as applied.

Authority for Requirement: DNR Construction Permits 98-A-212-S3 & 00-A-602-S1

#### **For All Emission Points**

Control equipment parameters:

- A. The permittee shall maintain the paint booth's filters according to the manufacturer's specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permits referenced in Table M-2

### **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

#### **For EPs 987-S02-P & 987-S03-P**

- A. The identification of any material used in the spray booth.
- B. The as-applied VOC content and the as-applied solids content of any material used in the booth (lbs/gal).
- C. The total amount of material used in the spray booth (gallons).
- D. The rolling 12-month total of the amount of material used in the spray booth (gallons)



- E. Any maintenance done on the booth’s filters. In addition, permittee shall record when the filters are changed.

Authority for Requirement: DNR Construction Permits 11-A-461 & 00-A-601-S1

For EPs 987-S04-P & 987-S05-P

- A. The identification of any material used in the spray booth.
- B. The as-applied VOC content and the as-applied solids content of any material used in the booth (lbs/gal).
- C. The total amount of material used in the spray booth (gallons).
- D. The rolling 12-month total of the amount of material used in the spray booth (gallons)
- E. Any maintenance done on the booth’s filters. In addition, permittee shall record when the filters are changed.

Authority for Requirement: DNR Construction Permits 98-A-212-S3 & 00-A-602-S1

**NSPS/NESHAP Applicability**

See Plant-wide conditions.

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

Table M-3			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft from ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
987-S02-P	987-S02-U	11-A-461	28.2	Vertical Unobstructed	42	70	21,000
987-S03-P		00-A-601-S1	28.2	Vertical Unobstructed	42	70	21,000
987-S04-P	987-S04-U	98-A-212-S3	28.2	Vertical Unobstructed	42	70	21,000
987-S05-P		00-A-602-S2	28.2	Vertical Unobstructed	42	70	21,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

*Required for 987-S02-C & 987-S04-C*

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Spray Booth Filter Agency Operation & Maintenance Plan**

**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and be available upon request.

**Quality Control**

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: 982-S10-P**

Associated Equipment

Associated Emission Unit ID Numbers: 982-S10-U  
Emissions Control Equipment ID Number: 982-S10-C  
Emissions Control Equipment Description: Dry Filters

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**Applicable Requirements**

Emission Unit vented through this Emission Point: 982-S10-U  
Emission Unit Description: Model Shop Paint Booth  
Raw Material/Fuel: Paints, Solvents, Lacquers, Adhesives  
Rated Capacity: 7 gallons/hr

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity  
Emission Limit(s): 40%<sup>(1)</sup>  
Authority for Requirement: DNR Construction Permit 06-A-1146  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g. stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)  
Emission Limit(s): 0.66 lb/hr  
Authority for Requirement: DNR Construction Permit 06-A-1146

Pollutant: Particulate Matter (PM)  
Emission Limit(s): 0.01 gr/dscf  
Authority for Requirement: DNR Construction Permit 06-A-1146  
567 IAC 23.4(13)

## **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Operating Limits**

Process throughput:

- A. The maximum amount of surface coating material (paint and solvent) used in the affected emission unit, EU 982-S10, shall not exceed 1,000 gallons per rolling twelve-month period.
- B. The maximum VOC content of the surface coating material (paint and solvent) used in the affected emission unit, EU 982-S10 shall not exceed 7.50 pounds per gallon.

Authority for Requirement: DNR Construction Permit 06-A-1146

### **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The permit holder, owner or operator of the facility shall record the identification and VOC content of all surface coating materials used in the affected emission unit, EU 982-S10.
- B. The permit holder, owner or operator of the facility shall calculate and record the monthly total and the 12-month rolling total amount of surface coating material used in the affected emission unit, EU 982-S10, in gallons.
- C. The permit holder, owner or operator of the facility shall maintain manufacturer/vendor provided information (i.e. Material Safety Data Sheets (MSDS), technical data sheets, etc.) of all materials used in the emission unit, which clearly indicates the VOC content of that material.
- D. The permit holder, owner or operator of the facility shall record the compliance option being used by the facility to show compliance with the applicable NESHAP Subpart JJ and Subpart MMMM. If applicable, the permit holder, owner or operator of the facility shall also record the date that the facility switches compliance options.

Authority for Requirement: DNR Construction Permit 06-A-1146  
567 IAC 23.1(4)"aj"  
567 IAC 23.1(4)"cm"  
40 CFR 63 Subpart JJ  
40 CFR 63 Subpart MMMM

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

- Stack Height (feet from the ground): 27
- Stack Diameter (inches): 34
- Stack Exhaust Flow Rate (scfm): 7,700
- Stack Temperature (°F): Ambient
- Discharge Style: Vertical Unobstructed
- Authority for Requirement: DNR Construction Permit 06-A-1146

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**                      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**                      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes  No

<b><u>Spray Booth Filter Agency Operation &amp; Maintenance Plan</u></b>
<p><b>Weekly</b>  Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.  Maintain a written record of the observation and any action resulting from the inspection.</p> <p><b>Record Keeping and Reporting</b>  Maintenance and inspection records will be kept for five years and be available upon request.</p> <p><b>Quality Control</b>  The filter equipment will be operated and maintained according to the manufacturer's recommendations.</p>

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: 987-S01-P**

Associated Equipment

Associated Emission Unit ID Numbers: 987-S01-U  
Emissions Control Equipment ID Number: 987-S01-C  
Emissions Control Equipment Description: Dry Filters

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**Applicable Requirements**

Emission Unit vented through this Emission Point: 987-S01-U  
Emission Unit Description: Maintenance Dry Filter Spray Booth  
Raw Material/Fuel: Paint and Solvents  
Rated Capacity: 1.25 gallons/hr

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity  
Emission Limit(s): 40%<sup>(1)</sup>  
Authority for Requirement: DNR Construction Permit 96-A-089-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)  
Emission Limit(s): 0.50 lb/hr  
Authority for Requirement: DNR Construction Permit 96-A-089-S1

Pollutant: Particulate Matter (PM)  
Emission Limit(s): 0.50 lb/hr; 0.01 gr/dscf  
Authority for Requirement: DNR Construction Permit 96-A-089-S1  
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): 7.8 tons/yr  
Authority for Requirement: DNR Construction Permit 96-A-089-S1

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Operating Limits**

Process throughput:

- A. The amount of coatings used in the Maintenance Paint Spray Booth shall not exceed 2,500 gallons in any rolling twelve-month period.
- B. The VOC content of any coating used in the Maintenance Paint Spray Booth shall not exceed 6.24 pounds of VOC per gallon.

#### **Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The identification of any coating used in the Maintenance Paint Spray Booth.
- B. The VOC content of any coating used in the Maintenance Paint Spray Booth.
- C. The amount of coating used in the Maintenance Paint Spray Booth (gallons).
- D. The rolling 12-month total of the amount of coating used in the Maintenance Paint Spray Booth (gallons).

Authority for Requirement: DNR Construction Permit 96-A-089-S1

### **NSPS/NESHAP Applicability**

See Plant-wide conditions.

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft from the ground): 26.5

Stack Opening (inches, dia.): 42

Stack Exhaust Flow Rate (scfm): 25,600

Stack Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 96-A-089-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Spray Booth Filter Agency Operation & Maintenance Plan**

**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and be available upon request.

**Quality Control**

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)



**Emission Point ID: See Table N-1 – Test Vehicle Exhausts**

Associated Equipment

**Table N-1**

<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Raw Material/ Fuel</b>	<b>Rated Capacity</b>
959-P02-P	959-P02-U	Shipout Road Test Booth	Diesel	600 HP
970-V01-P	970-V01-U	Customer Service Motorhome Exhaust	Diesel or Gasoline	600 HP
977-V01-P	977-V01-U	Chassis Weld Vehicle Exhaust	Diesel	700 HP
978-V01-P	978-V01-U	Warranty Motorhome Exhaust	Diesel or Gasoline	600 HP
978-V02-P	978-V02-U	Warranty Motorhome Exhaust	Diesel or Gasoline	600 HP
979-V05-P	979-V05-U	Motor Home Plant Line 2 Vehicle Exhaust	Gasoline	400 HP
989-V01-P	989-V01-U	Truck Shop Vehicle Exhaust	Diesel or Gasoline	600 HP
989-V03-P	989-V03-U	Truck Shop Vehicle Exhaust	Diesel or Gasoline	600 HP

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table N-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table N-2**

<b>Emission Point ID</b>	<b>Emission Unit ID</b>	<b>Opacity 567 IAC 23.3(2)"d"</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>PM (gr/dscf) 567 IAC 23.3(2) "a"</b>	<b>PM (lb/hr)</b>	<b>SO<sub>2</sub> (lb/MMBtu) 567 IAC 23.3.(3)"b"</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>DNR Construction Permit</b>
959-P02-P	959-P02-U	40% <sup>(1)</sup>	0.82	0.05	0.82	2.5	NA	05-A-571
970-V01-P	970-V01-U	40% <sup>(1)</sup>	0.445	0.1	0.445	2.5	0.30	05-A-041-S1
978-V01-P	978-V01-U	40% <sup>(1)</sup>	0.445	0.1	0.445	2.5	0.30	05-A-042-S1
978-V02-P	978-V02-U	40% <sup>(1)</sup>	0.445	0.1	0.445	2.5	0.30	05-A-043-S1
989-V01-P	989-V01-U	40% <sup>(1)</sup>	0.565	0.1	0.565	2.5	0.30	05-A-044-S1
989-V03-P	989-V03-U	40% <sup>(2)</sup>	0.565	0.1	NA	2.5	NA	05-A-046-S1

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(3)</sup> DNR Construction Permit 05-A-571

**Table N-3**

EP ID	EU ID	Opacity 567 IAC 23.3(2) "d"	PM <sub>10</sub> (lb/hr)	PM (gr/dscf) 567 IAC 23.3(2)"a"	PM (lb/hr)	SO <sub>2</sub> (lb/ MMBtu) 567 IAC 23.3(3) "b"	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)
977-V01-P	977-V01-U	40% <sup>(1)</sup>	0.92	0.1	0.92	2.5	1.44	2.89	0.61
979-V05-P	979-V05-U	20%	0.81	0.1	0.81	2.5	1.42	2.89	3.00

Authority for Requirement: 07-A-1348-S1 (EP 977-V01-P), 07-A-1278 (EP979-V05-P)

<sup>(1)</sup> An exceedance of the indicator opacity of 20% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

Process throughput:

**For Emission Unit 959-P02-U:**

A. The sulfur content of diesel oil burned shall not exceed 0.5 percent by weight.

Authority for Requirement: DNR Construction Permit 05-A-571

**For Emission Units 970-V01-U, 978-V01-U, 978-V02-U, 989-V01-U, 989-V03-U:**

A. The fuel used in the vehicles that are operated in this area shall have a maximum sulfur content of 0.05% by weight.

Authority for Requirement: DNR Construction Permits referenced in Table N-2

Hours of operation:

**For Emission Unit 989-V03-U:**

A. Emission Unit 989-V03-U shall only operate between the hours of 6:00 AM and 6:00 PM.

Authority for Requirement: DNR Construction Permit 05-A-046-S1

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

**For Emission Unit 959-P02-U:**

- A. The permittee shall maintain records on the sulfur content of the oil burned in the engines that are tested in this emissions unit.

Authority for Requirement: DNR Construction Permit 05-A-571

**For Emission Unit 989-V03-U:**

- A. For each day of operation of this unit, record the time operation began and the time operation ended.
- B. Only on-road vehicles are tested in this area. If non-road vehicles are tested, the owner or operator must provide supplier certification of sulfur content in fuel used.

Authority for Requirement: DNR Construction Permit 05-A-046-S1

**Emission Point Characteristics**

*The emission points listed in the table below shall conform to the specifications listed below.*

Table N-4			Stack Characteristics				
Emission Point ID	Emission Unit ID	Construction Permit	Stack Height (ft from the ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
959-P02-P	959-P02-U	05-A-571	30	Vertical Unobstructed	15	100	1,900
970-V01-P	970-V01-U	05-A-041-S1	19.5	Downward	8	300	1,040
977-V01-P	977-V01-U	07-A-1348-S1	11.67	Downward	12	100	2,280
978-V01-P	978-V01-U	05-A-042-S1	26	Vertical Unobstructed	8	250	1,800
978-V02-P	978-V02-U	05-A-043-S1	26	Vertical Unobstructed	8	250	1,800
979-V05-P	979-V05-U	07-A-1278	31	Vertical Unobstructed	15	100	2,000
989-V01-P	989-V01-U	05-A-044-S1	22	Horizontal	10 x 12	300	1,320
989-V03-P	989-V03-U	05-A-046-S1	30	Vertical Unobstructed	12	300	1,320

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: 952-S01-P**

### Associated Equipment

Associated Emission Unit ID Numbers: 952-S01-U

Emissions Control Equipment ID Number: none

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### **Applicable Requirements**

Emission Unit vented through this Emission Point: 952-S01-U

Emission Unit Description: Emissions Attributed To Aerosol Can Point Of Use

Raw Material/Fuel: Spent Aerosol Cans

Rated Capacity: 65.79 cans/hr (based on limit of 50,000 cans/12-mo rolling period)

### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 05-A-040-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 05-A-040-S2  
567 IAC 23.3(2)"a"

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

- A. The throughput of this unit shall not exceed 50,000 aerosol cans per twelve month period, rolled monthly.
- B. No waste other than that accumulated from the functionally spent aerosol cans shall be transferred to waste drums in this unit.
- C. At the end of each month, record the number of functionally spent cans that were popped in this booth over the previous month.

- D. At the end of each month, record the number of functionally spent cans that were popped in this booth over the previous twelve (12) months.
- E. At the end of each month, record the amount of waste that was collected from the spent aerosol cans in this booth over the previous month.
- F. At the end of each month, record the amount of waste that was collected from the spent aerosol cans in this booth over the previous twelve (12) months.

Authority for Requirement: DNR Construction Permit 05-A-040-S2

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft from the ground): 14.5

Stack Opening (inches, dia.): 12 x 12

Stack Exhaust Flow Rate (scfm): 1,300

Stack Temperature (°F): 70

Discharge Style: Horizontal

Authority for Requirement: DNR Construction Permit 05-A-040-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: 967-P01-P**

Associated Equipment

Associated Emission Unit ID Numbers: 967-P01-U  
Emissions Control Equipment ID Number: none

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**Applicable Requirements**

Emission Unit vented through this Emission Point: 967-P01-U  
Emission Unit Description: De-gas Fuel Inerting System  
Raw Material/Fuel: Nitrogen Gas, Empty Fuel Tanks  
Rated Capacity: Approx. 5 Tanks/hr

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

No applicable emission limits requirements at this time.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft from the ground): 26.5  
Stack Opening (inches, dia.): 0.75  
Stack Exhaust Flow Rate (scfm): 10  
Stack Temperature (°F): 70  
Discharge Style: Downward  
Authority for Requirement: DNR Construction Permit 05-A-038-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID Number: 977-F10-P (Fugitives)**

Associated Equipment

Associated Emission Unit ID Numbers: 977-F10-U

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**Applicable Requirements**

Emission Unit vented through this Emission Point: 977-F10-U  
Emission Unit Description: Electrocoat Tank  
Raw Material/Fuel: Electrocoat Resins and Solvents  
Rated Capacity: 9500 gallons

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 14-A-569  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 14-A-569  
567 IAC 23.4(13)

Pollutant: Hazardous Air Pollutants (Total HAP)

Emission Limit(s): 2.6 lb/gal solids

Authority for Requirement: DNR Construction Permit 14-A-569  
567 IAC 23.1(4)"cm"

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

- A. The maximum amount of as mixed epoxy coating material introduced into the Electrocoat Tank, EU 977-F10-U, shall not exceed 53,333 gallons per rolling twelve-month period.
- B. The maximum amount of other materials introduced into the Electrocoat Tank, EU 977-F10-U, shall not exceed 1500 gallons per rolling twelve-month period



- C. The maximum VOC content of the as mixed epoxy coating material introduced into the Electrocoat Tank, EU 977-F10-U, shall not exceed 1.20 pounds per gallon.
- D. The maximum VOC content of any other material introduced into the Electrocoat Tank, EU 977-F10-U, shall not exceed 8.0 pounds per gallon.
- E. The owner or operator shall limit organic HAP emission to the atmosphere as per the emission requirements of 40 CFR §63.3890.
- F. The owner or operator shall comply with the compliance procedures and monitoring requirements of 40 CFR §63.3900.

**Reporting & Record keeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.*

- A. The permit holder, owner or operator of the facility shall record the identification and VOC content any material introduced into the Electrocoat Tank, EU 977-F10-U.
- B. The permit holder, owner or operator of the facility shall calculate and record the monthly total and the 12-month rolling total amount of epoxy coating material introduced into the Electrocoat Tank, EU 977-F10-U, in gallons.
- C. The permit holder, owner or operator of the facility shall calculate and record the monthly total and the 12-month rolling total amount of other material introduced into Electrocoat Tank, EU 977-F10-U, in gallons.
- D. The permit holder, owner or operator of the facility shall maintain manufacturer/vendor provided information (i.e., Material Safety Data Sheets (MSDS), technical data sheets, etc.) of all materials used in the emission unit, which clearly indicates the VOC content of that material.
- E. Submit the notifications for NESHAP MMMM as required by 40 CFR 63.3910.
- F. Submit the reports for NESHAP MMMM as required by 40 CFR 63.3920.
- G. Maintain records for NESHAP MMMM as required by 40 CFR 63.3930.

Authority for Requirement: DNR Construction Permit 14-A-569  
 567 IAC 23.1(4)"cm"  
 40 CFR 63 Subpart MMMM

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

- Stack Height (ft, from the ground): Vents inside
- Stack Opening (inches): Vents inside
- Exhaust Flowrate (scfm): Vents inside
- Exhaust Temperature (°F): Vents inside
- Discharge Style: Vents inside
- Authority for Requirement: DNR Construction Permit 14-A-569

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table P-1 – Miscellaneous Sources**

Associated Equipment

**Table P-1**

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity
977-C08-P	977-C08-U	Cleaning Tank	Cleaning Material	NA
977-C09-P	977-C09-U	Cleaning Tank	Cleaning Material	NA
977-PC1-P	977-PC1-U	E-Coat Small Part Powder Coating Booth	Powder Coating	NA
990-PC1-P	990-PC1-U	CAPCO Powder Coating Booth	Powder Coating	NA

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table F-1b.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

**Table P-2**

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM (gr/dscf) 567 IAC 23.4(13)	DNR Construction Permit
977-C08-P	977-C08-U	40%	0.1	Exempt
977-C09-P	977-C09-U	40%	0.1	Exempt
977-PC1-P	977-PC1-U	40%	0.01	Exempt
990-PC1-P	990-PC1-U	40%	0.01	Exempt

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID: CCEG-P**

### Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): CCEG-U

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Emission Unit vented through this Emission Point: CCEG-U  
Emission Unit Description: Computer Center Emergency Generator  
Raw Material/Fuel: Diesel  
Rated Capacity: 300 hp

NOTE: This unit is exempt from construction permitting since the rated capacity is less than 400 hp.

### **Applicable Requirements**

#### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

Pollutant: Opacity  
Emission Limit(s): 40%  
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)  
Emission Limit(s): 0.1 gr/dscf  
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)  
Emission Limit(s): 40%  
Authority for Requirement: 567 IAC 23.3(2)"e"

#### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

#### **NESHAP:**

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(ii) this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

#### **Compliance Date**

Per 63.6595(a)(1) you must comply with the provisions of Subpart ZZZZ that are applicable by May 3, 2013.

Operation and Maintenance Requirements 40 CFR 63.6602, 63.6625, 63.6640 and Tables 2c and 6 to Subpart ZZZZ

1. Change oil and filter every 500 hours of operation or annually, whichever comes first. (See 63.6625(i) for the oil analysis option to extend time frame of requirements.)
2. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.
3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
4. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
5. Install a non-resettable hour meter if one is not already installed.
6. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

Operating Limits 40 CFR 63.6640(f)

1. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (*up to*) 50 hours per year is prohibited.
2. There is no time limit on the use of emergency stationary RICE in emergency situations.
3. You may operate your emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR 63.6640(f)(2) for additional information and restrictions.
4. You may operate your emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Recordkeeping Requirements 40 CFR 63.6655

1. Keep records of the maintenance conducted on the stationary RICE.
2. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR 63.6655(f) for additional information.

Notification and Reporting Requirements 40 CFR 63.6645, 63.6650 and Table 2c to Subpart ZZZZ

1. An initial notification is not required per 40 CFR 63.6645(a)(5).
2. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. (See Footnote 1 of Table 2c for more information.)

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ  
567 IAC 23.1(4)"cz"

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: SEG-P, PREG-P**

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material/ Fuel	Rated Capacity(hp)	Construction Date
SEG-P	SEG-U	Security Emergency Generator	Natural Gas	42.5	1979
PREG-P	PREG-U	Phone Room Emergency Generator	Natural Gas	42.5	1985

NOTE: These units are exempt from construction permitting since the rated capacity is less than 400 hp.

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table below shall not exceed the levels specified below.*

Emission Point ID	Emission Unit ID	Opacity 567 IAC 23.3(2)"d"	PM (gr/dscf) 567 IAC 23.3(2)"a"	Sulfur Dioxide (SO <sub>2</sub> ) 567 IAC 23.(3)"e"
SEG-P	SEG-U	40%	0.1	500 ppmv
PREG-P	PREG-U	40%	0.1	500 ppmv

**Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

NESHAP:

These emergency engines (SEG-P & PREG-P) are subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(ii) these spark ignition emergency engines, located at a major source, are existing stationary RICE as they were constructed prior to June 12, 2006.

Compliance Date

Per 63.6595(a)(1) you must comply with the provisions of subpart ZZZZ that are applicable by October 19, 2013.

Operation and Maintenance Requirements 40 CFR 63.6602, 63.6625, 63.6640 and Tables 2c and 6 to Subpart ZZZZ

1. Change oil and filter every 500 hours of operation or annually, whichever comes first. (See 63.6625(j) for the oil analysis option to extend time frame of requirements.)

2. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
4. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
5. Install a non-resettable hour meter if one is not already installed.
6. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

#### Operating Limits 40 CFR 63.6640(f)

1. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (*up to*) 50 hours per year is prohibited.
2. There is no time limit on the use of emergency stationary RICE in emergency situations.
3. You may operate your emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR 63.6640(f)(2) for additional information and restrictions.
4. You may operate your emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

#### Recordkeeping Requirements 40 CFR 63.6655

3. Keep records of the maintenance conducted on the stationary RICE.
4. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR 63.6655(f) for additional information.

#### Notification and Reporting Requirements 40 CFR 63.6645, 63.6650 and Table 2c to Subpart ZZZZ

3. An initial notification is not required per 40 CFR 63.6645(a)(5).
4. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. (See Footnote 1 of Table 2c for more information.)

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ  
567 IAC 23.1(4)"cz"



**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point ID: See Table R-1 – Heaters**

Associated Equipment

**Table R-1**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>Rated Capacity (MMBtu/hr)</b>
973-O04-P	973-O04-U	Rotocast 1500 Oven Exhaust	1.5
973-O06-P	973-O06-U	Rotocast 1500 Oven Exhaust	1.5
973-O08-P	973-O08-U	Rotocast 430 Oven Exhaust	5.6
977-C06-P	977-C06-U	Electrocoat Tube Heat Exchanger	3.8
977-C07-P	977-C07-U	Electrocoat Tube Heat Exchanger	2.5
990-W05-P	990-W05-U	Powder Paint Washer Burner Exhaust	1.5

NOTE: All units listed in Table R-1 fire on natural gas and are exempt from construction permitting since the rated capacity is less than 10 MMBtu/hr.

**Applicable Requirements**

*The following requirements apply to the emission points identified in Tables R-1.*

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from the emission points listed in the table above shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

### G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a 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 the permit. *567 IAC 22.108 (9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"*

### G2. Permit Expiration

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

### G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

#### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

#### **G6. Annual Fee**

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

#### **G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

**G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

**G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

**G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.

- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

**G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

**G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

**G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

**G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall

be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

## 2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control



of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 22.108(16)*

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

#### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

#### **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 - 22.144(455B));
- e. The changes comply with all applicable requirements.
- f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
  - i. A brief description of the change within the permitted facility,
  - ii. The date on which the change will occur,
  - iii. Any change in emission as a result of that change,
  - iv. The pollutants emitted subject to the emissions trade
  - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change.

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

### **G18. Duty to Modify a Title V Permit**

#### 1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that does any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or

iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

## 2. Minor Title V Permit Modification.

a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

i. Do not violate any applicable requirement;

ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;

iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;

iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;

v. Are not modifications under any provision of Title I of the Act; and

vi. Are not required to be processed as significant modification under rule 567 - 22.113(455B).

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

ii. The permittee's suggested draft permit;

iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify.

However, if the permittee fails to comply with its proposed permit terms and conditions

during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

### 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.111-567 IAC 22.113*

### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *567 IAC 22.1(1)*

### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (*567 IAC 23.1(3)"a"*); training fires and controlled burning of a demolished building (*567 IAC 23.2*).

### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must

comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)

e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a"*, *567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions

standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 22.114(3)*

#### **G25. Permit Shield**

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit;  
or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

#### **G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

**G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of *567 IAC 22.111(1)*. *567 IAC 22.111 (1)"d"*



**G29. Disclaimer**

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

**G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department’s request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau  
Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

*567 IAC 25.1(7)"a", 567 IAC 25.1(9)*

**G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.

*567 IAC 26.1(1)*

**G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

**Field Office 1**

1101 Commercial Court, Suite 10  
Manchester, IA 52057  
(563) 927-2640

**Field Office 2**

2300-15th St., SW  
Mason City, IA 50401  
(641) 424-4073

**Field Office 3**

1900 N. Grand Ave.  
Spencer, IA 51301  
(712) 262-4177

**Field Office 4**

1401 Sunnyside Lane  
Atlantic, IA 50022  
(712) 243-1934

**Field Office 5**

Wallace State Office Building  
502 E 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-0268

**Field Office 6**

1023 West Madison Street  
Washington, IA 52353-1623  
(319) 653-2135

**Polk County Public Works Dept.**

Air Quality Division  
5885 NE 14th St.  
Des Moines, IA 50313  
(515) 286-3351

**Linn County Public Health**

Air Quality Branch  
1020 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000

## V. Appendix A

### Links to Standards

- A. 40 CFR 63 Subpart A – *General Provisions* for National Emission Standards for Hazardous Air Pollutants.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.10.63.a>
- B. 40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants for *Wood Furniture Manufacturing Operations*  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.11.63.jj>
- C. 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for *Surface Coating of Miscellaneous Metal Parts and Products*.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.mmmsm>
- D. 40 CFR 63 Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for *Surface Coating of Plastic Parts and Products*.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.pppp>
- E. 40 CFR 63 Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for *Reinforced Plastic Composites Production*.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.wwww>
- F. 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for *Stationary Reciprocating Internal Combustion Engines*.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.zzzz>
- G. 40 CFR Part 63 Subpart DDDDD - National Emission Standard for Hazardous Air Pollutants *Industrial, Commercial, and Institutional Boilers and Process Heaters*.  
<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.ddddd>

### Link to MDI Emissions Reporting Guidelines

<http://polyurethane.americanchemistry.com/Resources-and-Document-Library/MDI-Emissions-Reporting-Guidelines-for-the-Polyurethane-Industry.pdf>