Florida Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
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Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Skyline Corporation
2520 By-Pass Road
Elkhart, IN 46514

Authorized Representative:

Mr. Paul Abrams, Environmental Health and Safety (EH&S) Manager

Air Permit No. 0830102-006-AC
Permit Expires: 09/30/2012
Site Name : Cameron Florida (#538)
Minor Source Air Construction Permit
Project Name: Minor Modification

This is the final air construction permit, which lowers emissions limits and establishes this facility as a minor source. **This facility is currently not in service and placed in long-term reserve shutdown effective 12/31/2008.** The work is conducted at the Cameron Florida (#538) Site (Standard Industrial Classification No. 2451). The facility is located in Marion County at 3030 West Silver Springs Boulevard in Ocala, Florida. The UTM coordinates are Zone 17, 385.89 km East, and 3229.16 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental

Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

August 10, 2012

Caroline Shine
District Air Program Administrator
Central District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on August 10, 2012to the persons listed below.

Mr. Paul Abrams, Skyline Corporation **(pabrams@skylinecorp.com)**
Mr. Bill MacDonald, DECA Environmental **(BillM@decaenvironmental.com)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department clerk, receipt of which is hereby acknowledged.

August 10, 2012

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Cameron Florida (#538)

The facility is a mobile home manufacturing facility that emits fugitive volatile organic compounds (VOCs), fugitive hazardous air pollutants (HAPs), and particulate emissions from manufacturing processes, wood and drywall cutting operations, and metal frame assembly processes.

This facility is currently not in service and placed in long-term reserve shutdown effective 12/31/2008.

The existing facility consists of the following emissions units.

Facility ID No. 0830102	
ID No.	Emission Unit Description
001	Manufacturing Building
002	Cyclone and Baghouse

Project Description

The purpose of this project is to modify Air Construction Permit No. 0830102-001-AC. This project establishes the facility as a minor source. This facility was previously permitted under a FESOP.

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a minor source.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 0830102-001-AC

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Central District's Air Resource Management Section. The Central District's mailing address and phone number are:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Suite 232
   Orlando, Florida 32803-3767
   Telephone: 407-897-2931

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. **The permittee submitted application for Non-Title V Air Operation Permit**

on 05/30/2012 and the Non-Title V Air Operation Permit No. 0830102-005-AO is concurrently processing with this project.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. Facility-Wide Specific Conditions

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Manufacturing Building
002	Cyclone and Baghouse

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum annual production rate shall not exceed 5,000 frames per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.3. Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter from the surface coating operations. Reasonable precautions shall include, but are not limited to, the following:

a. Surface coating shall be conducted in a designated area inside the manufacturing building;
b. The surface coating area shall be separated with a wall from other operations at the facility;
c. Waterborne coating shall be used for all metal coating;
d. An air-assisted airless spray gun shall be used for higher transfer efficiency and high fallout factor from surface coating operations; and
e. Openings in the proximity of the surface coating area shall be closed, if necessary, during coating operations to minimize unconfined particulates from escaping the building.

[Rule 62-296.320(4)(c), F.A.C.]

A.4. VOC or Organic Solvents (OS) Emissions: The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be utilized to minimize pollutant emissions:

a. Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.;
b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, tank etc. of VOC so that it can be covered when not in use;
c. All equipment, fittings, valve lines, pipes, drums, etc. shall be properly operated and maintained;
d. Prevent excessive air turbulence across exposed VOCs; and

e. All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C.]

A.5. Objectionable Odor: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2), F.A.C]

EMISSIONS STANDARDS

A.6. Emission Limitations**:** The maximum **facility-wide** VOC and HAP emissions are limited as follows:

Pollutant	**Emission Limits (tons/any consecutive 12 month period)**
Total Volatile Organic Compounds (VOCs)	Less than 50.0
Total Hazardous Air Pollutants (HAPs)	Less than 20.0
Individual Hazardous Air Pollutant (HAP)	Less than 8.0

[Rules 62-210.200(PTE) and 62-210.300(2)(a)1, F.A.C.]

A.7. General Visible Emissions (VE) Limitation: Visible emissions for each source that emits particulates shall not exceed 5 percent opacity.
[Rule 62-297.620(4), F.A.C.]

TESTING REQUIREMENTS

A.8. **Start- up Compliance Test: The cyclone/baghouse shall be tested to demonstrate compliance with the emissions standards for visible emissions, specified in Specific Condition No. A.7 and A.11., no later than thirty (30) days after start-up of the unit.**
[Rule 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.9. Compliance Tests Prior to Renewal: Compliance tests shall be performed for the cyclone/baghouse once every five (5) years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **A.7.**
[Rule 62-297.310, F.A.C.]

A. Facility-Wide Specific Conditions

A.10. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.11. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources: **Shall last thirty (30) minutes or the length of the batch/cycle.**

The above method is described in Rule 62-297.401(9)(c), F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-297.310(4)(a) and 62-297.401(9)(c), F.A.C.]

A.12. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at the permitted capacity, the emissions unit may be tested at a lesser rate. In this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

NOTIFICATION REQUIREMENTS

A.13. Test Notification: The permittee shall notify the Compliance Authority at least 15 days prior to any required tests. The permittee shall include the date, time, and location of such tests, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee.

{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.14. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU Nos. 001 and 002, no later than five (5) business days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.15. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.16. Monthly Recordkeeping: In order to demonstrate compliance with Specific Condition No. **A.6.,** the permittee shall maintain a monthly log to support the VOC/HAP usage rate and emissions. At a minimum, the log shall contain the following:

a. Date (Month and Year);
b. The total of VOC emissions, total HAP emissions, and individual HAP emissions for each month;
c. The consecutive 12-month total of VOC emissions, total HAP emissions, and individual HAP emissions;
d. The total quantity of frames manufactured for each month; and
e. The consecutive 12-month total quantity of frames manufactured.

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.

[Rule 62-4.070(3), F.A.C.]

A.17. Preventative Maintenance Plan (PMP) for Cyclone/Baghouse: The permittee shall maintain and implement a PMP to include a quarterly schedule for the maintenance and inspection of the cyclone/baghouse. Records of inspections, maintenance, and performance data of these control devices shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request.

a. Quarterly PMP Log shall include, at a minimum, the following:

i. Time, date, and signature of inspector.
ii. Inspection of bags for tears and/or leaks and cyclone for operational performance.
iii. Inspection of belts, pulleys, fan assembly, and motors.
iv. Inspection of ductwork.
v. Inspection of collected dust holding bin.
vi. Inspection of area housekeeping.

[Rule 62-4.070(3), F.A.C.; Permit application received 05/30/12]

A.18. Supporting Documentation: Supporting documentation (chemical usage tracking logs, "As Supplied" sheets, "As Applied" sheets, MSDS sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years and made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle).
[Rule 62-4.070(3), F.A.C.]

A.19. Record Retention: The records required in Specific Condition No. **A.16**. shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.
[Rules 62-4.070(3) and 62-210.300(2)(b)1.e., F.A.C.]