



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 18, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: U.S Cargo Division of Forest River / 039-18029-00431

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**U.S. Cargo – A Division of Forest River
17645 Commerce Drive
Bristol, Indiana 46507**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-18029-00431	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 18, 2004 Expiration Date: May 18, 2009

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary cargo trailers manufacturing plant.

Authorized Individual:	General Manager
Source Address:	17645 Commerce Drive, Bristol, Indiana 46507
Mailing Address:	3010 College Avenue, Goshen, Indiana 46527
General Source Phone:	(574) 534-6913
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) wood working facility, having a maximum throughput capacity of 600 pounds of plywood per hour, controlled by three (3) baghouses, and exhausting at stacks D-1, D-2 and D-3. This facility was constructed in 1997.
- (b) Surface coating operations, consisting of:
 - (1) A paint shop consisting of two (2) spray booths using high volume low pressure (HVLP) guns to coat metal, with a maximum rated capacity of 7.75 units per hour and a maximum throughput rate of 1.47 gallons per hour, and exhausting at stacks SV-4 and SV-5. This facility was constructed in 1997.
 - (2) Two (2) trailer assembly areas applying sealant and adhesives to plywood, with a maximum rated capacity of 7.75 units per hour and a maximum usage rate of 0.50 gallons per hour. This facility was constructed in 1997.
 - (3) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.
- (c) Two (2) metal inert gas (MIG) welding operations, constructed in 1997 and consisting of:
 - (1) Twenty-five (25) welding stations consuming a total of 0.833 pounds of electrode per hour.
 - (2) Seventeen (17) welding stations consuming a total of 1.20 pounds of electrode per hour.
- (d) Natural gas fired combustion units, constructed in 1997 and consisting of:

- (1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of 0.16 MMBtu per hour.
- (2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of 2.60 MMBtu per hour.
- (3) Two (2) natural gas-fired burners, each with a maximum heat input capacity of 4.25 MMBtu per hour.
- (4) Three (3) natural gas-fired drying ovens. Drying oven 1 has a maximum heat input capacity of 5.00 MMBtu per hour, drying oven 2 has a maximum heat input capacity of 1.6 MMBtu per hour, drying oven 3 has a maximum heat input capacity of 3.5 MMBtu per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if

specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

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

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

expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Units Description:

- (a) One (1) wood working facility, having a maximum throughput capacity of 600 pounds of plywood per hour, controlled by three (3) baghouses, and exhausting at stacks D-1, D-2 and D-3. This facility was constructed in 1997.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the one (1) woodworking facility shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.2 Particulate Control

In order to comply with Condition D.1.1, the three (3) baghouses for particulate control shall be in operation and control emissions from the one (1) woodworking facility at all times that the one (1) woodworking facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units

and the associated process will be shut down immediately until the failed units have been repaired or replaced.

SECTION D.2

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (b) Surface coating operations, consisting of:
- (1) A paint shop consisting of two (2) spray booths using high volume low pressure (HVLP) guns to coat metal, with a maximum rated capacity of 7.75 units per hour and a maximum throughput rate of 1.47 gallons per hour, and exhausting at stacks SV-4 and SV-5. This facility was constructed in 1997.
 - (2) Two (2) trailer assembly area applying sealant and adhesives to plywood, with a maximum rated capacity of 7.75 units per hour and a maximum usage rate of 0.50 gallons per hour. This facility was constructed in 1997.
 - (3) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.

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

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the paint shop consisting of two (2) spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the paint shop (consisting of two (2) spray booths) shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not already

regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the one (1) powder coating booth shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(c) Two (2) metal inert gas (MIG) welding operations, constructed in 1997 and consisting of:

- (1) Twenty-five (25) welding stations consuming a total of 0.833 pounds of electrode per hour.
- (2) Seventeen (17) welding stations consuming a total of 1.20 pounds of electrode per hour.

(d) Natural gas fired combustion units, constructed in 1997 and consisting of:

- (1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of 0.16 MMBtu per hour.
- (2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of 2.60 MMBtu per hour.
- (3) Two (2) natural gas-fired burners, each with a maximum heat input capacity of 4.25 MMBtu per hour.
- (4) Three (3) natural gas-fired drying ovens. Drying oven 1 has a maximum heat input capacity of 5.00 MMBtu per hour, drying oven 2 has a maximum heat input capacity of 1.6 MMBtu per hour, drying oven 3 has a maximum heat input capacity of 3.5 MMBtu per hour.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	U.S. Cargo – A Division of Forest River
Address:	17645 Commerce Drive
City:	Bristol, Indiana 46507
Phone #:	(574) 534-6913
MSOP #:	039-18029-00431

I hereby certify that U.S. Cargo – A Division of Forest River is still in operation.
 no longer in operation.

I hereby certify that U.S. Cargo – A Division of Forest River is in compliance with the requirements of MSOP 039-18029-00431
 not in compliance with the requirements of MSOP 039-18029-00431

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

Issued May 18, 2004

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: U.S. Cargo - A Division of Forest River
Source Location: 17645 Commerce Drive, Bristol, Indiana, 46507
County: Elkhart
SIC Code: 3799
Operation Permit No.: 039-18029-00431
Permit Reviewer: ERG/SD

On April 5, 2004, the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that U.S. Cargo - A Division of Forest River had applied for a Minor Source Operating Permit (MSOP) to operate a stationary cargo trailers manufacturing plant. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit. Bold language has been added and the language with a line through it has been deleted. The Table of Contents has been updated as necessary.

1. Condition D.2.5(b) which refers to maintaining a log of weekly overspray observations, daily and monthly inspections is not consistent with Condition D.2.2 which refers to what actions to be taken if overspray is visibly detected. Therefore, the Condition D.2.5(b) has been corrected as shown below:

D.2.5 Record Keeping Requirements

-
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain a ~~log of weekly overspray observations, daily and monthly inspections~~ **record of any actions taken if overspray is visibly detected.**
 2. Due to the recent changes in the Emission Statement Rule, 326 IAC 2-6, which was revised on March 27, 2004 and published in the April 1, 1004 Indiana Register, this source is not required to submit an emission statement because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program) and is located in Elkhart County. Therefore, Condition C.10 - Emission Statement was removed from the permit as shown below:

~~C.10~~ Emission Statement [326 IAC 2-6]

- ~~(a)~~ The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The statement must be submitted to:

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

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- ~~(b)~~ The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

~~C.1044~~ General Record Keeping Requirements [326 IAC 2-6.1-5]

~~C.1142~~ General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	U.S.Cargo – A Division of Forest River
Source Location:	17645 Commerce Drive, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	039-18029-00431
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from U. S. Cargo – A Division of Forest River, relating to the operation of a cargo trailers manufacturing plant.

Source Definition

This source consists of two (2) plants:

- (a) Plant 1 is located at 17645 Commerce Drive, Bristol, Indiana 46507.
- (b) Plant 2 is located at 17830 Commerce Drive, Bristol, Indiana 46507.

These plants are on contiguous properties. The two plants operate under the same SIC code (3799) and are owned by one (1) company. IDEM, OAQ, has determined that since the two (2) plants are located in contiguous properties, have the same SIC codes, and are owned by one (1) company, they will be considered as one source.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) wood working facility, having a maximum throughput capacity of 600 pounds of plywood per hour, controlled by three (3) baghouses and exhausting at stacks D-1, D-2 and D-3. This facility was constructed in 1997.
- (b) Surface coating operations, consisting of:
 - (1) Two (2) trailer assembly areas applying sealant and adhesives to plywood, with a maximum rated capacity of 7.75 units per hour and a maximum usage rate of 0.50 gallons per hour. This facility was constructed in 1997.
 - (2) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.
- (c) Two (2) metal inert gas (MIG) welding operations, constructed in 1997 and consisting of:
 - (1) Twenty-five (25) welding stations consuming a total of 0.833 pounds of electrode per hour.
 - (2) Seventeen (17) welding stations consuming a total of 1.20 pounds of electrode per hour.

- (d) Natural gas fired combustion units, constructed in 1997 and consisting of:
 - (1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of 0.16 MMBtu per hour.
 - (2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of 2.60 MMBtu per hour.
 - (3) Two (2) natural gas-fired burners, each with a maximum heat input capacity of 4.25 MMBtu per hour.
 - (4) Three (3) natural gas-fired drying ovens. Drying oven 1 has a maximum heat input capacity of 5.00 MMBtu per hour, drying oven 2 has a maximum heat input capacity of 1.6 MMBtu per hour, drying oven 3 has a maximum heat input capacity of 3.5 MMBtu per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 039-7197-00431, issued March 26, 1997.
- (b) Transfer of Permit Approval 039-12908-00431, issued December 18, 2000

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Recommendation

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

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

An application for the purposes of this review was received on August 11, 2003, with additional information received on February 17, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 10).

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of

material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/year)
PM	39.0
PM10	39.0
SO ₂	0.07
VOC	29.6
CO	10.3
NO _x	12.2

HAPs	Potential to Emit (tons/yr)
Toluene	4.22
Ethylene Glycol Ether	0.29
Methylene Chloride	0.71
Trichloroethylene	0.61
Hexane	1.33
Total	7.16

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic

compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	39.0
PM10	39.0
SO ₂	0.07
VOC	22.5
CO	10.3
NO _x	12.2
Single HAP (Toluene)	4.22
Combination HAPs	7.16

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on potential to emit calculations for the source (see Appendix A).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on the potential to emit calculations for the source as shown in Appendix A.

Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR 60.720, Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines) because the source does not coat plastic parts. This source coats metal and wood trailer parts.

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

- (b) This source is not subject to 40 CFR 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing (326 IAC 14) because this source is not a major source of HAPs as defined in 40 CFR 63, Subpart A and does not manufacture wood furniture or wood furniture components.
- (c) This source is not subject to 40 CFR 63, Subpart MMMM - National Emission Standard for Hazardous Air Pollutant (NESHAPs) for Miscellaneous Metal Parts and Products because this source uses less than 250 gallons of coating per year and is not a major source of Hazardous Air Pollutants (HAPs).

- (d) There are no other National Emission Standard for Hazardous Air Pollutant (NESHAPs) (326 IAC 14 and 40 CFR 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than ten (10) tons per year of VOC and NOx and is located in Elkhart County. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was a minor source when it was built in 1997 and is not in 1 of the 28 listed source categories. At construction, the potential to emit of each criteria pollutant from the entire source was less than 250 tons per year. The source was modified in 2000 to add one (1) powder coating booth. After this modification, the potential to emit of each criteria pollutant from the entire source remained less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The operation of this cargo trailers manufacturing plant will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – One (1) Woodworking Facility

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking facility shall not exceed 1.83 pounds per hour when operating at a process weight rate equal to six hundred (600) pounds of plywood per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = 4.10P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The three (3) baghouses shall be in operation at all times the woodworking facility is in operation, in order to comply with this rule.

Visible emissions notations are not required for the three (3) baghouses because the allowable pursuant to 326 IAC 6-3-2 are low.

State Rule Applicability – Surface Coating Facilities

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

The paint shop (consisting of two (2) spray booths) and two (2) trailer assembly facilities are not subject to 326 IAC 8-1-6 (General Reduction Requirement) because potential VOC emissions from each facility is less than twenty-five (25) tons per year.

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

(a) The paint shop (consisting of two (2) spray booths) is subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes) because this facility uses more than five (5) gallons of coating per day pursuant to 326 IAC 6-3-1(a)(15).

Pursuant to 326 IAC 6-3-2(d), the paint shop shall comply with the following requirements:

- (1) Particulate from the paint shop (consisting of two (2) spray booths) shall be controlled by a dry particulate filters, and the control device shall be operated in accordance with the manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (C) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(b) The two (2) trailer assembly facilities are not subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes) because each facility uses less than five (5) gallons of sealant and adhesives per day pursuant to 326 IAC 6-3-1(a)(15).

(c) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the one (1) powder coating booth shall not exceed 0.551 pounds per hour.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) The paint shop (consisting of two (2) spray booths) is subject to 326 IAC 8-2-9 because this facility paints metal parts. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the paint shop consisting of two (2) spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent

spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

- (b) The two (2) trailer assembly facilities are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because these units do not apply coating on metal frames, they apply adhesives and sealants on plywood.
- (c) The one (1) powder coating booth is not subject to the requirements of 326 IAC 8-2-9 because the powder coatings do not have any VOC emissions.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations) because the paint shop (consisting of two (2) spray booths), two (2) trailer assembly facilities, and one (1) powder coating facility do not surface coat automobile and light duty truck bodies. These units are used for surface coating metal frames used in cargo trailers.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because the paint shop (consisting of two (2) spray booths), two (2) trailer assembly facilities, and one (1) powder coating facility do not surface coat wood furnishings. These units are used for applying sealants and adhesives to plywood.

State Rule Applicability - Welding Facilities

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

This source is not subject to 326 IAC 6-3-1 (Particulate Matter Emission Limitations for Manufacturing Processes) because the two (2) metal inert gas (MIG) welding operations consume less than six hundred and twenty-five (625) pounds of rod or wire per day pursuant to 326 IAC 6-3-1(b)(9).

State Rule Applicability - Natural-Gas Fired Combustion Units

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

The natural gas-fired combustion units consisting of forty-two (42) radiant heaters, one (1) air make-up unit, two (2) burners, and three (3) drying ovens are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because particulate emissions from these units are from combustion only.

Conclusion

The operation of this cargo trailers manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 039-18029-00431.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Forty-two (42) Radiant Heaters and One (1) Air Make-up Unit**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Plt ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

Total Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

9.32 (43 units total)

81.6

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.31	0.31	0.02	4.08	0.22	3.43

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

METHODOLOGY

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Forty-two (42) Radiant Heaters and One (1) Air Make-up Unit**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Plt ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	8.573E-05	4.899E-05	3.062E-03	7.348E-02	1.388E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	2.04E-05	4.49E-05	5.72E-05	1.55E-05	8.57E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Burners, Three (3) Drying Ovens**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Plt ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

Total Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

18.6 (5 Units Only)

163

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.62	0.62	0.05	8.15	0.45	6.84

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

METHODOLOGY

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Two (2) Burners, Three (3) Drying Ovens**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Pit ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.711E-04	9.776E-05	6.110E-03	1.466E-01	2.770E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	4.07E-05	8.96E-05	1.14E-04	3.10E-05	1.71E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Facility**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Plt ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

POTENTIAL TO EMIT IN TONS PER YEAR USING AMOUNT OF DUST COLLECTED

Emission Unit	* Dust Collected (lbs/hour)	PTE of PM/PM10	
		(lbs/hour)	(tons/year)
Woodworking	1.88	1.88	8.30

* Assume all PM emissions are equal to PM10 emisisions
 Note: The source collects 5 pounds of dust per day per line.
 Three (3) baghouses in total with 99 % efficiency

METHODOLOGY

PTE PM/PM10 (lbs/hour) = Dust collected (lbs/unit) * Max. Throughput Rate (units/hour)
 PTE PM/PM10 (tons/year) = Dust collected (lbs/unit) * Max. Throughput Rate (units/hour) * 8760 hours/year * 1 ton/2000 lb

lbs * 1/Control Efficiency %

Appendix A: Emissions Calculations
VOC Emissions
From Two (2) Flaw Repair Units and One (1) Paint Shop

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Pit ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

VOC Emissions From Plant 1- Flaw Repair

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/year)	**Transfer Efficiency	PTE of PM/PM10 (lbs/hour)
Cyclo Brake Cleaner	12.0	100%	0.00%	100%	0.00%	0.00%	0.005	7.75	12.0	12.0	0.47	11.16	2.04	0.00	55%	0.00
Cyclo 33	5.92	91.8%	0.00%	91.8%	0.00%	0.00%	0.002	7.75	5.43	5.43	0.08	2.0	0.37	0.01	55%	0.00
Cyclo 35	9.34	57.3%	0.00%	57.3%	61.3%	43.0%	0.013	7.75	13.8	5.35	0.54	12.9	2.36	0.79	55%	0.18
Cyclo Adhesive	5.60	83.0%	0.00%	83.0%	0.0%	17.0%	0.010	7.75	4.65	4.65	0.36	8.65	1.58	0.15	55%	0.03
Sealant	13.0	33.0%	0.00%	33.0%	0.0%	57.0%	0.004	7.75	4.30	4.30	0.13	3.20	0.58	0.00	100%	0.00
Caulking	8.59	0.00%	0.00%	0.0%	0.0%	0.00%	0.001	7.75	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00
6.93														0.95		

VOC Emissions From Plant 2- Flaw Repair

Caulking	10.59	0.00%	0.00%	0.0%	0.0%	0.00%	0.001	7.75	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00
Cyclo 33	5.92	91.80%	0.00%	91.8%	0.0%	0.00%	0.002	7.75	5.43	5.43	0.08	2.02	0.37	0.01	55%	0.00
Cyclo 35	9.34	57.30%	0.00%	57.3%	61.3%	43.00%	0.013	7.75	13.8	5.35	0.54	12.94	2.36	0.79	55%	0.18
Cyclo Adhesive	5.60	83.00%	0.00%	83.0%	0.0%	17.0%	0.010	7.75	4.65	4.65	0.36	8.65	1.58	0.00	100%	0.00
Sealant	13.00	33.00%	0.00%	33.0%	0.0%	57.00%	0.004	7.75	4.29	4.29	0.13	3.19	0.58	0.53	55%	0.12
4.89														1.34		

VOC Emissions From Paint Shop Consisting of Two (2) Spray Booths

ZPG-20060	11.5	20.0%	0.00%	20.0%	0.0%	62.0%	0.100	7.75	2.30	2.30	1.78	42.8	7.81	14.1	55%	3.21
Toluene	7.25	100%	0.00%	100%	0.0%	0.0%	0.010	7.75	7.25	7.25	0.56	13.49	2.46	0.00	55%	0.00
90-907 Black Enamel	8.42	74.6%	60.6%	14.0%	61.3%	22.3%	0.170	7.75	3.05	1.18	1.55	37.27	6.80	5.55	55%	1.27
17.1														19.6		

** Coating is applied using HVLP guns, except for sealant and caulking applications, which are applied using a putty knife. All units are controlled by dry filters.

METHODOLOGY

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

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC/Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour) * 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hour) = Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %)

**Appendix A: Emissions Calculations
HAP Emissions
From Two (2) Trailer Assembly Units and One (1) Paint Shop**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Pft ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

VOC Emissions From Plant 1- Trailer Assembly

POTENTIAL TO EMIT IN TONS PER YEAR

Material	Density (lb/gal)	Max Usage (gal/unit)	Max. Throughput (unit/hour)	Weight % Toulene	Weight % Ethylene Glycol Ether	Weight % Methylene Chloride	Weight % Trichloroethylene	Weight % Hexane	POTENTIAL TO EMIT IN TONS PER YEAR					
									Toluene	Ethylene Glycol Ether	Methylene Chloride	Trichloroethylene	Hexane	
Cyclo Brake Cleaner	12.0	0.005	7.75			35.0%	30.0%				0.71	0.61		
Cyclo 33	5.92	0.002	7.75											
Cyclo 35	9.34	0.013	7.75	20.0%					0.82					
Cyclo Adhesive	5.60	0.010	7.75					35.0%						0.67
Sealant	13.0	0.004	7.75	3.0%					0.05					
Caulking	8.59	0.001	7.75											
VOC Emissions From Plant 2- Trailer Assembly														
Caulking	10.59	0.001	7.75											
Cyclo 33	5.92	0.002	7.75											
Cyclo 35	9.34	0.013	7.75	20.0%					0.82					
Cyclo Adhesive	5.60	0.010	7.75					35.0%						0.67
Sealant	13.00	0.004	7.75	3.0%					0.05					
VOC Emissions from Paint Shop														
ZPG-20060	11.5	0.100	7.75											
Toluene	7.25	0.010	7.75	100%					2.46					
90-907 Black Enamel	8.42	0.170	7.75		5.00%					0.29				
TOTAL									4.22	0.29	0.71	0.61	1.33	

METHODOLOGY

PTE of HAP (tons/year) = Density (lb/gal) * Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Welding Operation**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Pit ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

Process (MIG)	Number of Stations	Max. Electrode Consumption (lbs/hr)	*Emission Factors (lb pollutant/lb electrode)				Potential To Emit (lbs/hour)			
			PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
NS-101-705-3	17	1.20	5.2E-03	3.2E-03	1.0E-05	1.0E-05	1.06E-01	6.49E-02	2.04E-04	2.04E-04
NS-101-705-4	25	0.833	5.2E-03	3.2E-03	1.0E-05	1.0E-05	1.08E-01	6.62E-02	2.08E-04	2.08E-04

PTE of PM/PM10 (tons/year) = 2.14E-01

PTE of HAPs (tons/year) = 1.32E-01

*Emission factors are from AP-42, Chapter 12.19, Tables 12.19-1, and 12.19-2 SCC 3-09-050

MIG = Metal Inert Gas MIG Welding

METHODOLOGY

PTE (lbs/hour) = No. of Stations * Max. Electrode Consumption (lbs/hour) * Emission Factor (lbs pollutant/lbs electrode)

PTE (tons/year) = No. of Stations * Max. Electrode Consumption (lbs/hour) * Emission Factor (lbs pollutant/lbs electrode) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
PM/PM10 Emissions
From One (1) Powder Coating Line**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Plt ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

Emission Unit	Max. Throughput Rate (lbs/hour)	Weight % Solids	Transfer Efficiency (%)	*PTE of PM/PM10 (tons/year)
Powder Coating Booth	5.00	100%	65%	7.67
				7.67

*Assume all PM emissions are equal to PM10 emissions

METHODOLOGY

$$\text{PTE PM/PM10 (tons/year)} = \text{Max. Throughput Rate (lb/hour)} * \text{Weight \% Solids} * 8760 \text{ hours/year} * 1 \text{ ton/2000 lbs} * (1 - \text{Transfer Efficiency \%})$$

**Appendix A: Emissions Calculations
Summary of Emissions**

Company Name: U.S.Cargo - A Division of Forest River
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP: 039-18029
Pit ID: 039-00431
Reviewer: ERG/SD
Date: February 19, 2004

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Unit	PM	PM10	SO ₂	NO _x	VOC	CO	* Single HAP	Combined HAP
Combustion Plant 1	0.31	0.31	0.02	4.08	0.22	3.43	negligible	negligible
Combustion Plant 2	0.62	0.62	0.05	8.15	0.45	6.84	negligible	negligible
Woodworking	8.30	8.30						
Trailer assembly 1	0.95	0.95			6.93			
Trailer assembly 2	1.34	1.34			4.89			
Paint Shop	19.6	19.6			17.1		4.22	7.16
Welding	0.21	0.21						
Powder Coating Booth	7.67	7.67						
	39.0	39.0	0.07	12.2	29.6	10.3	4.22	7.16

* Toluene