



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 25, 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: American Camper Manufacturing / MSOP 039-18080-00467

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

**American Camper Manufacturing, LLC d/b/a Ameri-Camp  
72440 State Road 13 North  
Syracuse, Indiana 46567**

(herein known as the Permittee) is hereby authorized to *construct and* 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 039-18080-00467	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 25, 2004  Expiration Date: June 25, 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)]

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The Permittee owns and operates stationary travel trailer assembly plant, hat produces travel trailers.

Authorized Individual:	President
Source Address:	72440 State Road 13 North, Syracuse, Indiana 46567
Mailing Address:	P.O. Box 249, Syracuse, Indiana 46567
General Source Phone:	(574) 528-6007
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Maintenance for Ozone <b>under the 1-hr standard</b> <b>Basic nonattainment for Ozone under the 8-hour standard</b>
Source Status:	Attainment area for all other criteria pollutants Minor Source Operating Permit Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Woodworking operations, identified as WW, with a maximum capacity of 250.0 pounds of lumber per hour (lbs/hr), using a baghouse, identified as DC-1, for particulate control and exhausting to stack DC1.
- (b) One (1) production trailer assembly line, identified as PL-1, receiving materials from the woodworking operations and the pre-finished metal frames. PL-1 has a maximum capacity of 250 pounds per hour (lbs/hr), and exhausting to the east and west doors of building 1, identified as B1E and B1W.
- (c) One (1) aluminum welding unit, identified as W1, with maximum capacities of 2.5 pounds of electrodes per hour, and exhausting to stacks S1-S4.
- (d) Natural gas combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (e) Storage of gasoline in a 300 gallon capacity above ground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly.
- (f) Storage of diesel fuel in a 300 gallon capacity aboveground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly.

## **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]**

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

### **B.2 Definitions**

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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]**

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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]**

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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]**

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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)]**

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- (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]**

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- (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]**

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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 Operation [326 IAC 2-6.1-6(d)(3)]**

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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]**

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- (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, Billing, Licensing, and Training 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 to 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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 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.7 Performance Testing [326 IAC 3-6]

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- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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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.9 Compliance Monitoring [326 IAC 2-1.1-11]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

C.11 Compliance Response Plan - Preparation and Implementation

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

#### **C.12 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

#### **Record Keeping and Reporting Requirements**

##### **C.13 Malfunctions Report [326 IAC 1-6-2]**

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

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

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- (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 report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does 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

## EMMISIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Woodworking operations, identified as WW, with a maximum capacity of 250.0 pounds of lumber per hour (lbs/hr), using a baghouse, identified as DC-1, for particulate control and exhausting to stack DC1.
- (b) One (1) production trailer assembly line, identified as PL-1, receiving materials from the woodworking operations and pre-finished metal frames. PL-1 has a maximum capacity of 250 pounds per hour (lbs/hr), and exhausting to the east and west doors of building 1, identified as B1E and B1W.
- (c) One (1) aluminum welding unit, identified as W1, with maximum capacities of 2.5 pounds of electrodes per hour, and exhausting to stacks S1- S4.
- (d) Natural gas combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (e) Storage of gasoline in a 300 gallon capacity above ground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly
- (f) Storage of diesel fuel in a 300 gallon capacity aboveground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coatings in one (1) production line, identified as PL-1, shall be controlled by a dust collector system 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.1.3 Particulate [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.0 pounds per hour when operating at a process weight rate of 250 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:

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

$$E = 4.10 \times [250/2000]^{0.67} = 1.02 \text{ pounds per hour}$$

#### D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.1.5 Particulate Control

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In order to comply with condition D.1.3, the baghouse (DC-1) for particulate control shall be in operation and control emissions from the woodworking facility at all times that the facility is in operation.

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

#### D.1.6 Visible Emissions Notations

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- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

#### D.1.7 Broken or Failed Bag Detection

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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.

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

#### D.1.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the woodworking facility's baghouse stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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).

<b>Company Name:</b>	<b>American Camper Manufacturing, LLC d/b/a Ameri-Camp</b>
<b>Address:</b>	<b>72440 State Road 13 North, Syracuse, Indiana 46567</b>
<b>City:</b>	<b>Syracuse, Indiana</b>
<b>Phone #:</b>	<b>(574) 528-6007</b>
<b>MSOP #:</b>	<b>039-18080-00467</b>

I hereby certify that American Camper Manufacturing, LLC is  still in operation.  
 no longer in operation.

I hereby certify that American Camper Manufacturing is  in compliance with the requirements of MSOP **039-18080-00467**.  
 not in compliance with the requirements of MSOP **039-18080-00467**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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: \_\_\_\_/\_\_\_\_/19\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_ 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:

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# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

<b>Source Name:</b>	<b>American Camper Manufacturing, LLC d/b/a Ameri-Camp</b>
<b>Source Location:</b>	<b>72440 State Road 13 North, Syracuse, Indiana 46567</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3792</b>
<b>Operation Permit No.:</b>	<b>039-7325-00467</b>
<b>Operation Permit Issuance Date:</b>	<b>May 24, 1999</b>
<b>Permit Renewal No.:</b>	<b>039-18080</b>
<b>Permit Reviewer:</b>	<b>Femi Ogunsola/EVP</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from American Camper Manufacturing, LLC d/b/a Ameri-Camp relating to the operation of travel trailer assembly plant producing travel trailers.

### History

On May 25, 1999, OAQ issued The Commodore Corporation Part 70 Operating Permit No. 039-7325-00467 for its Syracuse, Indiana travel trailer assembly plant. On June 27, 2002, The Commodore Corporation notified the Office of Air Quality (OAQ) of the closing of their TV plant thus eliminating the need for the Title V permit. On July 18, 2002, the OAQ issued a revocation of the Title V permit. However, on July 29, 2002, The Commodore Corporation notified the OAQ that they were withdrawing their request to revoke their Part 70 Operating Permit. The notification also requested that the ownership be transferred and the name changed to American Camper Manufacturing, LLC, d/b/a Ameri-Camp. Effective as of August 1, 2002, The Commodore Corporation located SR 13, North Syracuse, Indiana has transferred ownership and changed the name of the company to American Camper Manufacturing, LLC, d/b/a Ameri-Camp but at the same location. The transfer of ownership was approved by IDEM on August 27, 2002.

On September 26, 2003, American Camper Manufacturing, LLC d/b/a Ameri-Camp submitted application for the renewal of their Part 70 Permit. This application also indicates modifications to the operations since the time of occupancy by Ameri-Camp but no modifications to the layout of the source or any of the stacks since the issuance of the original Part 70 Permit to The Commodore Corporation. Also a few facilities have been removed. Ameri-Camp has requested that their permit level be changed to that of a minor source operating permit (MSOP) since these modifications have resulted in a reduction in the source-wide potential to emit regulated air pollutants below the Part 70 major source thresholds, as defined in 326 IAC 2-7-1(22). As such, and pursuant to 326 IAC 2-7-2 (Applicability), the Part 70 requirements no longer apply and this source is being issued a Minor Source Operating Permit (MSOP) pursuant to 326 IAC 2-6.1.

### **Permitted Emission Units and Pollution Control Equipment**

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

- (a) Woodworking operations, identified as WW, with a maximum capacity of 250.0 pounds of lumber per hour (lbs/hr), using a baghouse, identified as DC-1, for particulate control and exhausting to stack DC1.
- (b) One (1) production trailer assembly line, identified as PL-1, receiving materials from the woodworking operations and the pre-finished metal frames. PL-1 has a maximum capacity of 250 pounds per hour (lbs/hr), and exhausting to the east and west doors of building 1, identified as B1E and B1W.
- (c) One (1) aluminum welding unit, identified as W1, with maximum capacities of 2.5 pounds of electrodes per hour, and exhausting to stacks S1-S4.
- (d) Natural gas combustion sources with heat input equal to or less than five (5) millions Btu per hour.
- (e) Storage of gasoline in a 300 gallon capacity above ground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly.
- (f) Storage of diesel fuel in a 300 gallon capacity aboveground storage tank (AST). Throughput to this tank is approximately 1,800 gallons per year and the tank is filled bimonthly.
- (g) Facilities that have been removed and no longer exist at the source since transfer of ownership are as follows:
  - (1) One production line, identified as PL-2, receiving homes to be finished from PL-1 and appliances and miscellaneous components. PL-2 has a maximum capacity of 19,909.0 finished pounds per hour (lbs/hr), and exhausting to the east and west doors of building 2, identified as B2E and B2W.
  - (2) One (1) paint booth, equipped with one (1) spray gun, identified as SG-1, with a maximum capacity of 2019.73 pounds of metal frame per hour (lbs/hr), using a dry filter for overspray control and exhausting to stack S7.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

### **Existing Approvals**

The source has been operating under previous approvals including, but no limited to, the following:

- (a) Part 70 Operating Permit, T039-7325-00467, issued to The Commodore Corporation on May 25, 1999.
- (b) First Reopening No.: 039-13221-00467, issued to The Commodore Corporation on December 14, 2001.

- (c) Title V Revocation No.: 039-15798-00467, issued to The Commodore Corporation on July 18, 2002 (cancelled).
- (d) First Administrative Amendment No: 039-16449-00467, issued to The Commodore Corporation on August 27, 2002.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the construction and 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.

A complete application for the purposes of this review was received on September 26, 2003.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1 through 5 of TSD Appendix A).

### 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/yr)
PM	greater than 25, less than 100
PM <sub>10</sub>	greater than 25, less than 100
SO <sub>2</sub>	less than 25
VOC	less than 25
CO	less than 25
NO <sub>x</sub>	less than 25

HAPs	Potential to Emit (tons/yr)
Xylene	less than 10
Toluene	less than 10
Ethyl Benzene	less than 10
MDI	less than 10
MEK	less than 10
Hexane	less than 10
Glycol Ethers	less than 10
MIBK	less than 10
Methanol	less than 10
Total	less than 10

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of 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) 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
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Maintenance
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 maintenance 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 or unclassifiable for remaining 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.

### 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/yr)
PM	3.0
PM <sub>10</sub>	3.0
SO <sub>2</sub>	0.0
VOC	7.8
CO	0.0
NO <sub>x</sub>	0.0
Single HAP	1.3 (Xylene)
Combination HAPs	3.3

- (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 an application submitted by the source.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **039-18080-00467**, 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 all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

## Federal Rule Applicability

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

The aboveground gasoline storage tank, identified as AST, with storage capacity of 300 gallons and maximum throughput of approximately 1,800 gallons per year is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because the design capacity is less than 75 m<sup>3</sup>.

The aboveground diesel fuel storage tank, identified as AST, with storage capacity of 300 gallons and maximum throughput of approximately 1,800 gallons per year is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because the design capacity is less than 75 m<sup>3</sup>.

- (b) The production line (PL-1) wood coating facility is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14(Wood Furniture Manufacturing Operations), 40 CFR 63 Subpart JJ due to its size. The uncontrolled potential to emit of combination of hazardous air pollutants (HAPs) and single worst case HAP for the plant are less than twenty five (25) tons per year and ten (10) tons per year respectively.

## State Rule Applicability – Entire Source

### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 2, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

### 326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit of VOC and NOX are less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

### State Rule Applicability – Individual Facilities

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

The operation of one (1) production line, identified as PL-1 will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Particulate from the production line (PL-1) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. 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:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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.

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

The particulate from the woodworking operation (WW) shall be limited by the following:

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

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

$$E = 4.10 (250/2000)^{0.67} = 1.02 \text{ pounds per hour.}$$

The dust collector system shall be in operation at all times the woodworking operation (WW) is in operation, in order to comply with this limit.

#### 326 IAC 8-6-2 (Organic Solvent Emission Limitations)

The emission unit identified as one (1) production line (PL-1) has potential to emit of VOCs less than 100 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. Therefore, the requirements of 326 IAC 8-6 are not applicable.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The procedures (airless spray application, brush and wipe, trowel, and tube applications) used on the production line (PL-1) are consistent with the accepted application methods, therefore, the source is in compliance with the requirements of 326 IAC8-2-12.

## **Conclusion**

The construction and operation of this travel trailer assembly plant shall be subject to the conditions of the **Minor Source Operating Permit 039-18080-00467**.

# Indiana Department of Environmental Management

## Office of Air Quality

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

#### Source Background and Description

**Source Name:** American Camper Manufacturing, LLC d/b/a Ameri-Camp  
**Source Location:** 72440 State Road 13 North, Syracuse, IN 46567  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** 039-18080-00467  
**Permit Reviewer:** Femi Ogunsola / EVP

On April 23, 2004, the Office of Air Quality (OAQ) had a notice published in The Truth in Elkhart, Indiana, stating that American Camper Manufacturing, LLC d/b/a Ameri-Camp had applied for a Minor Source Operating Permit (MSOP) to operate of travel trailer assembly plant that produces travel trailers. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed MSOP 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 MSOP should be issued as proposed.

No comment has been received from the source or other interest public persons during public notice or at the end of public notice. However, upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

#### Changes Resulting from Ozone 8-hour County Attainment Status Designations:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

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The Permittee owns and operates stationary travel trailer assembly plant, hat produces travel trailers.

Authorized Individual: President  
 Source Address: 72440 State Road 13 North, Syracuse, Indiana 46567  
 Mailing Address: P.O. Box 249, Syracuse, Indiana 46567  
 General Source Phone: (574) 528-6007  
 SIC Code: 3792  
 County Location: Elkhart  
 Source Location Status: Maintenance for Ozone **under the 1-hr standard**  
**Basic nonattainment for Ozone under the 8-hour standard**  
 Attainment area for all other criteria pollutants  
 Source Status: Minor Source Operating Permit  
 Minor Source, under PSD  
 Minor Source, Section 112 of the Clean Air Act

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
<b>1- hour Ozone</b>	<b>Maintenance</b>
<b>8-hour Ozone</b>	<b>Basic, Nonattainment</b>
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 maintenance 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.~~

(a) **Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.**

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

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- (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, ~~IM & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.

### Appendix A: Emission Calculations

**Company Name:** Amercan Camper Manufacturing, LLC d/b/a Ameri-Camp  
**Address City IN Zip:** 72440 State Road 13 North, Syracuse. Indiana 46567  
**Permit Number:** 039-18080-00467  
**Plt ID:** 039-00467  
**Reviewer:** Femi Ogunsola/EVP  
**Date:** 03/15/2004

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Operations	Woodworking Operations	Welding & Thermal Cutting Operations	TOTAL
PM	0.18	79.14	1.98	81.3
PM <sub>10</sub>	0.18	79.14	1.98	81.3
SO <sub>2</sub>	0.00	0.00	0.00	0.0
NO <sub>x</sub>	0.00	0.00	0.00	0.0
VOC	7.83	0.00	0.00	7.8
CO	0.00	0.00	0.00	0.0
total HAPs	2.94	0.00	0.40	3.3
worst case single HAP	1.30	0.00	0.30	1.3
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Operations	Woodworking Operations	Welding & Thermal Cutting Operations	TOTAL
PM	0.18	0.79	1.98	3.0
PM <sub>10</sub>	0.18	0.79	1.98	3.0
SO <sub>2</sub>	0.00	0.00	0.00	0.0
NO <sub>x</sub>	0.00	0.00	0.00	0.0
VOC	7.83	0.00	0.00	7.8
CO	0.00	0.00	0.00	0.0
total HAPs	2.94	0.00	0.40	3.3
worst case single HAP	1.30	0.00	0.30	1.3
Total emissions based on rated capacity at 8,760 hours/year, after control.				

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

Company Name: American Camper Manufacturing, LLCd/b/a Ameri-Camp  
Address City IN Zip: 72440 State Road 13 North, Syracuse, Indiana 46567  
Permit Number: 039-18080-00467  
Pit ID: 039-00467  
Reviewer: Femi Ogunsola/EVP  
Date: 03/15/2004

Material	Type of Product and Material being coated	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
NuFlex Silicone Caulk	Plastic	8.59	0.00%	0.00%	0.00%	0.00%	100.00%	0.197	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	
Proline SU-6000-40-2S Adhesive	Wood	10.10	8.63%	0.00%	8.63%	0.00%	92.00%	0.793	0.25	0.87	0.87	0.17	4.15	0.76	0.00	0.95	100%	
Cyclo C-34 White Grease	Metal	6.67	80.00%	0.00%	80.00%	0.00%	60.00%	0.017	0.25	5.34	5.34	0.02	0.54	0.10	0.01	8.89	50%	
DAP Silicone Caulk	Plastic	8.54	3.00%	3.00%	0.00%	3.07%	96.93%	0.118	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	
Isopropanol	Plastic	6.60	100.00%	0.00%	100.00%	0.00%	0.00%	0.350	0.25	6.60	6.60	0.58	13.86	2.53	0.00	#DIV/0!	100%	
Lacquer Thinner	Plastic	7.04	100.00%	6.63%	93.37%	7.00%	0.00%	0.058	0.25	7.07	6.57	0.10	2.29	0.42	0.00	#DIV/0!	100%	
Mineral Spirits	Plastic	6.32	100.00%	0.00%	100.00%	0.00%	0.00%	0.167	0.25	6.32	6.32	0.26	6.33	1.16	0.00	#DIV/0!	100%	
VM & P Lacquer Thinner	Plastic	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.083	0.25	6.59	6.59	0.14	3.28	0.60	0.00	#DIV/0!	100%	
Windex	Glass	8.34	100.00%	92.00%	8.00%	92.00%	0.00%	0.025	0.25	8.34	0.67	0.00	0.10	0.02	0.00	#DIV/0!	100%	
Work Black Spray Paint	Metal	5.80	90.92%	29.00%	61.92%	25.22%	6.00%	0.065	0.25	4.80	3.59	0.06	1.40	0.26	0.02	59.86	50%	
Temp-Tak Adhesive	Wood	6.67	90.18%	85.00%	5.18%	85.03%	10.00%	0.225	0.25	2.31	0.35	0.02	0.47	0.09	0.06	3.46	65%	
Cyclo C-33 Spray Silicone	Wood	5.92	91.75%	0.00%	91.75%	0.00%	5.34%	0.063	0.25	5.43	5.43	0.09	2.05	0.37	0.02	101.72	50%	
Proline SU-6000-40-2S Adhesive	Wood	10.10	8.63%	0.00%	8.63%	0.00%	92.00%	0.793	0.25	0.87	0.87	0.17	4.15	0.76	0.00	0.95	100%	
Alpha 1016 Sealant	Rubber	9.34	34.00%	0.00%	34.00%	0.00%	56.23%	0.079	0.25	3.18	3.18	0.06	1.51	0.27	0.00	5.65	100%	
Alpha 8011 Adhesive	Rubber	8.51	40.24%	40.00%	0.24%	40.80%	59.00%	1.000	0.25	0.03	0.02	0.01	0.12	0.02	0.00	0.03	100%	
T651B Tempro Butyl Sealant	Plastic	12.18	16.26%	0.00%	16.26%	0.00%	85.00%	0.059	0.25	1.98	1.98	0.03	0.70	0.13	0.00	2.33	100%	
Russell 676 Adhesive	Wood	6.66	77.20%	23.10%	54.10%	23.07%	22.91%	0.091	0.25	4.68	3.60	0.08	1.97	0.36	0.08	15.73	50%	
Armstrong S-254 Adhesive	Wood	9.34	47.45%	43.28%	4.17%	48.47%	46.86%	0.005	0.25	0.76	0.39	0.00	0.01	0.00	0.00	0.83	100%	
<b>Total Potential Emissions</b>												<b>1.79</b>	<b>42.93</b>	<b>7.83</b>	<b>0.18</b>			

Add worst case coating to all solvents

1.79      42.93      7.83      0.18

**METHODOLOGY**

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

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** American Camper Manufacturing, LLC d/b/a Ameri-Camp  
**Address City IN Zip:** 72440 State Road 13 North, Syracuse, Indiana 46567  
**Permit Number:** 039-18080-00467  
**Pit ID:** 039-00467  
**Permit Reviewer:** Femi Ogunsola/EVP  
**Date:** 03/15/2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % MDI	Weight % MEK	Weight % Hexane	Weight % Glycol Ethers	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MDI Emissions (ton/yr)	MEK Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)	
NuFlex Silicone Caulk	8.59	0.197	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Proline SU-6000-40-2S Adhesive	10.10	0.793	0.25	7.00%	0.00%	1.50%	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.61	0.00	0.13	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.88
Cyclo C-34 White Grease	6.67	0.017	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DAP Silicone Caulk	8.54	0.118	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Isopropanol	6.60	0.350	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.04	0.058	0.25	0.00%	65.00%	0.00%	0.00%	10.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.29	0.00	0.00	0.04	0.00	0.00	0.04	0.00	0.00	0.38
Mineral Spirits	6.32	0.167	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VM & P Lacquer Thinner	6.59	0.083	0.25	5.00%	15.00%	0.90%	0.00%	0.00%	0.00%	4.00%	0.00%	3.00%	0.03	0.09	0.01	0.00	0.00	0.00	0.02	0.00	0.00	0.02	0.17
Windex	8.34	0.025	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.01
Work Black Spray Paint	5.80	0.065	0.25	0.00%	14.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06
Temp-Tak Adhesive	6.67	0.225	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	5.18%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.09
Cyclo C-33 Spray Silicone	5.92	0.063	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Proline SU-6000-40-2S Adhesive	10.10	0.793	0.25	7.00%	0.00%	1.50%	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.61	0.00	0.13	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.88
Alpha 1016 Sealant	9.34	0.079	0.25	0.00%	34.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.27
Alpha 8011 Adhesive	8.51	1.000	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
T651B Tempro Butyl Sealant	12.18	0.059	0.25	5.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
Russell 676 Adhesive	6.66	0.091	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.17	0.00	0.00	0.00	0.17
Armstrong S-254 Adhesive	9.34	0.005	0.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Potential Emissions</b>													<b>1.30</b>	<b>0.71</b>	<b>0.28</b>	<b>0.26</b>	<b>0.04</b>	<b>0.25</b>	<b>0.03</b>	<b>0.04</b>	<b>0.02</b>	<b>2.94</b>	
<b>Single Worst Case Potential Emission</b>													<b>0.61</b>	<b>0.29</b>	<b>0.13</b>	<b>0.13</b>	<b>0.04</b>	<b>0.17</b>	<b>0.02</b>	<b>0.04</b>	<b>0.02</b>		

**METHODOLOGY**

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

**Appendix A: Process Particulate Emissions**  
**Woodworking Activities**  
**Company Name: American Camper Manufacturing, LLC d/b/a Ameri-Camp**  
**Address City IN Zip: 72440 State Road 13 North, Syracuse, Indiana 46567**  
**Permit Number: 039-18080-00467**  
**Plt ID: 039-00467**  
**Reviewer: Femi Ogunsola/EVP**  
**Date: 03/15/2004**

<b>Uncontrolled Potential Emissions (tons/year)</b>						
<b>DUST COLLECTOR</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
DC1	1	0.0017	12400.0	1	99.00%	79.14
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>79.14</b>
<b>Controlled Potential Emissions (tons/year)</b>						
<b>DUST COLLECTOR</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
DC1	1	0.00170	12400.0	1	99.00%	0.79
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						<b>0.79</b>
<b>Allowable Emission (lb/hr) = 4.10 X [Process Weight Rate ]<sup>u,br</sup> = 1.0</b>						
<b>Methodology:</b>						
<b>Potential Emission (uncontrolled):</b>						
Potential Emission(tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)						
<b>Potential Emission (controlled):</b>						
Potential Emission (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)						

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name: American Camper Manufacturing, LLC d/b/a Arr**  
**Address City IN Zip: 72440 State Road 13 North, Syracuse, Indiana 4**  
**Permit Number: 039-18080-00467**  
**Plt ID: 039-00467**  
**Reviewer: Femi Ogunsola/EVP**  
**Date: 03/15/2004**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc												
Metal Inert Gas (MIG)(E705)	4	6.25		0.0052	0.00318	0.00001	0.00001	0.130	0.080	0.000	0.000	0.080
Stick (E7014 electrode)	3	5.0		0.021	0.0005	0.0001	0.0001	0.315	0.008	0.002	0.002	0.011
Tungsten Inert Gas (TIG)(carbon steel)												
Oxyacetylene(carbon steel)												
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	3	0.25	1.0	0.1622	0.0005	0.0001	0.0003	0.007	0.000	0.000	0.000	0.00000
Oxymethane												
Plasma**												
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.45				0.09
Potential Emissions lbs/day								10.86				2.17
Potential Emissions tons/year								1.98				0.40

**METHODOLOGY**

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t  
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb