



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 24, 2005
RE: Forest River Housing, Inc / 039-20196-00611
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 1/10/05



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Forest River Housing, Inc.
66700 State Road 19
Wakarusa, Indiana 46573

(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 039-20196-00611	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2005 Expiration Date: March 24, 2010



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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 modular/mobile home manufacturing facility.

Authorized Individual: VP Engineering
Source Address: 66700 State Road 19, Wakarusa, Indiana 46573
Mailing Address: 66700 State Road 19, Wakarusa, Indiana 46573
General Source Phone: (574) 533-5934
SIC Code: 2451
County Location: Elkhart
Source Location Status: Nonattainment area for 8-hour ozone
Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Nonattainment Area NSR
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) floor assembly area, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, and spray and with emissions exhausting inside the building. The unit was constructed in 1995.
- (b) One (1) roof assembly and shell finishing area, with a maximum capacity of 1.0 shells/hour, with materials applied by trowel, brush, extrusion, and air assist spray and with emissions exhausting inside the building. This unit is controlled by a permanent total enclosure and was constructed in 1995.
- (c) One (1) final finish area, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air assist spray, and airless spray can and with emissions exhausting inside the building. This unit is controlled by a permanent total enclosure and was constructed in 1995.
- (d) One (1) woodworking operation, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions exhausting inside the building. The unit was constructed in 1995.
- (e) Thirty-one (31) natural gas fired space heaters and two (2) air make-up units with a maximum total heat capacity of 7.17 MMBtu/hour and with emissions exhausting inside the building. The units were constructed in 1995.

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
Indianapolis, IN 46204

and

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

- (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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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 PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions 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
Indianapolis, Indiana 46204

and

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

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 Operation [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, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

B.12 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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
Indianapolis, Indiana 46204

and

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

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
Indianapolis, Indiana 46204

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.

C.9 Compliance Response Plan - Preparation and Implementation

- (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.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.11 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.12 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.13 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
Indianapolis, Indiana 46204

- (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 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, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Units Description:

- (b) One (1) roof assembly and shell finishing area, with a maximum capacity of 1.0 shells/hour, with materials applied by trowel, brush, extrusion, and air assist spray and with emissions exhausting inside the building. This unit is controlled by a permanent total enclosure and was constructed in 1995.
- (c) One (1) final finish area, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air assist spray, and airless spray can and with emissions exhausting inside the building. This unit is controlled by a permanent total enclosure and was constructed in 1995.

(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(d)]

- (a) Particulate from the surface coating shall be controlled by a permanent total enclosure, and the Permittee shall operate the permanent total enclosure 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.1.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), for surface coating operations in the roof assembly/shell finishing area and final finishing area, the Permittee shall:

- (a) Operate the coating operation inside the building.
- (b) Spray coat only the interior of the homes being manufactured.
- (c) Install overspray controls, if accumulations of undercoating are observed on fans, stacks or on the ground outside the plant.
- (d) Maintain and operate the air assisted spray equipment according to the manufacturer's recommendations.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a log of those inspections prescribed by the Preventive Maintenance Plan.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) woodworking operation, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions exhausting inside the building. The unit was constructed in 1995.

(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 Particulate [326 IAC 6-3-2]

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 9.49 pounds per hour when operating at a process weight rate of 7000 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:

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking 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.

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

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust when exhausting to the atmosphere.

- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (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:

- (a) One (1) floor assembly area, with a maximum capacity of 1.0 floors/hr, with materials applied by extrusion, trowel, wipe, brush, and spray can with emissions exhausting inside the building. The unit was constructed in 1995.
- (e) Thirty-one (31) natural gas fired space heaters and two (2) air make-up units with a maximum total heat capacity of 7.17 MMBtu/hour and with emissions exhausting inside the building. The units were constructed in 1995.

(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:	Forest River Housing, Inc.
Address:	66700 State Road 19
City:	Wakarusa, Indiana 46573
Phone #	(574) 533-5934
MSOP #:	039-20196-00611

I hereby certify that Forest River Housing, Inc. is

- still in operation.
 no longer in operation.

I hereby certify that Forest River Housing, Inc. is

- in compliance with the requirements of MSOP 039-20196-00611
 not in compliance with the requirements of MSOP 039-20196-00611

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:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document For a Minor Source Operating Permit

Source Background and Description

Source Name:	Forest River Housing, Inc.
Source Location:	66700 State Road 19, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	2451
Operation Permit No.:	MSOP 039-20196-00611
Permit Reviewer:	ERG/HJ

On February 12, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Forest River Housing, Inc. had applied for a Minor Source Operating Permit relating to the operation of a modular/mobile home manufacturing facility. The notice also stated that 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 OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. Based on the new State Rule 326 IAC 1-1-5 the following condition has been added to the permit.

B.12 Credible Evidence [326 IAC 1-1-6]

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

2. IDEM's mailing address was corrected throughout the permit:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6045~~
Indianapolis, Indiana 46204~~6-6045~~

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: Forest River Housing, Inc.
Source Location: 66700 State Road 19, Wakarusa, Indiana 46573
County: Elkhart
SIC Code: 2451
Operation Permit No.: MSOP 039-20196-00611
Permit Reviewer: ERG/HJ

The Office of Air Quality (OAQ) has reviewed an application from Forest River Housing, Inc. relating to the operation of a modular/mobile home manufacturing facility.

History

Previously, this source was owned by Hart Homes, Inc. The facility was purchased by Forest River Housing, Inc. on July 6 2004. Forest River discovered Hart Homes, Inc. had never obtained an air operating permit, although the potential to emit of PM10, PM and VOC is above permitting exemption levels. Forest River Housing, Inc. submitted an MSOP application.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) floor assembly area, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, and spray and with emissions exhausting inside the building. The unit was constructed in 1995.
- (b) One (1) roof assembly and shell finishing area, with a maximum capacity of 1.0 shells/hour, with materials applied by trowel, brush, extrusion, and air assist spray and with emissions exhausting inside the building. The unit was constructed in 1995.
- (c) One (1) final finish area, with a maximum capacity of 1.0 floors/hour, with materials applied by extrusion, trowel, wipe, brush, air assist spray, and airless spray can and with emissions exhausting inside the building. The unit was constructed in 1995.
- (d) One (1) woodworking operation, consisting of cross cutting with a chop table, hand saws, and routers, with a maximum wood processing rate of 7000 pounds per hour and with emissions exhausting inside the building. The unit was constructed in 1995.
- (e) Thirty-one (31) natural gas fired space heaters and two (2) air make-up units with a maximum total heat capacity of 7.17 MMBtu/hour and with emissions exhausting inside the building. The units were constructed in 1995.

Existing Approvals

The source currently has no existing approvals.

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 operating 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.

A completed application for the purposes of this review was received on September 30, 2004.

Emission Calculations

The calculation submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A, pages 1-6 of this document.

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	76.1
PM10	76.1
SO ₂	0.02
VOC	30.7
CO	2.62
NO _x	3.12

HAPs	Potential to Emit (tons/year)
Xylene	0.17
Methyl Ethyl Ketone	2.30
Toluene	0.83
Total	3.32

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year and the potential to emit PM, PM10, and VOC are greater than 25 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 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

- (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
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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	76.1
PM10	76.1
SO ₂	0.02
VOC	30.7
CO	2.62
NO _x	3.12
Single HAP	2.30
Combination HAPs	3.32

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one (1) of the twenty-eight (28) listed source categories.
- (b) These emissions were based on the MSOP application submitted by the source.

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.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing, because it is not a major HAP source.

State Rule Applicability – Entire Source

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

This existing source was initially constructed after the August 7 1980 rule applicability date. The source was constructed in 1995. Although constructed after the applicability date, this source is not considered a major source because, it is not in one of the 28 listed source categories and the source PTE is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, (PSD)) are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

The source is not located in Lake or Porter Counties and is not required to operate under a Part 70 permit; therefore, 326 IAC 2-6 (Emission Reporting), is 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 6-4-2 (Fugitive Dust Emissions)

This source was constructed prior to July 27, 1997 and is not a major source of HAP; therefore, the requirements of 326 IAC 2-4.1 do not apply.

State Rule Applicability – Surface Coating Operations

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

This source was constructed prior to July 27, 1997 and is not a major source of HAP; therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

Particulate from the surface coating in the roof assembly/shell finishing area and the final finishing area shall be controlled by a permanent total enclosure, 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 permanent total enclosure 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.

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.

Pursuant to 326 IAC 6-3-2(d), for surface coating operations in the roof assembly/shell finishing area and final finishing area, the Permittee shall:

- (a) Operate the coating operation inside the building.
- (b) Spray coat only the interior of the homes being manufactured.
- (c) Install overspray controls, if accumulations of undercoating are observed on fans, stacks or on the ground outside the plant.
- (d) Maintain and operate the air assisted spray equipment according to the manufacturer's recommendations.

IDEM made a case-by-case determination that the use of a permanent total enclosure in conjunction with the work practices outlined above constitutes an "equivalent control device" and satisfies 326 IAC 6-3-2 (d).

The surface coating operation in the floor assembly area is exempt from 326 IAC 6-3 because it uses less than 5 gallons of coating per day (see 326 IAC 6-3-1(b)(15)).

State Rule Applicability – One (1) Plywood Department (PD) Woodworking Facility

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

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 9.49 pounds per hour when operating at a process weight rate of 7,000 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:

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

This unit can comply with 326 IAC 6-3-2 without the use of a control device as demonstrated in the calculations in Appendix A.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. The three surface coating operations were each constructed in 1995 at this source. No other Article 8 rules apply to the product assembly coating operations at these plants (see discussions below).

The PTE of the three surface coating operations is each less than 25 tpy. Thus, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) are not applicable to coating facilities at this source.

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

This source does not coat metal parts. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

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

Although this source is located in Elkhart County and consists of surface coating facilities that were constructed prior to July 1, 1990, the requirements of 326 IAC 8-2-12 are not applicable. The source does not construct wood furniture or cabinets, rather does purchases and uses prefabricated, *pre-finished*, wood cabinets in the construction of mobile homes. The source has confirmed that no adhesives are used during cabinet assembly. The source does, however, use touch-up coatings for product finishing, but in amounts below 15 pounds of VOC per day and well below the exempted ten (10) gallons of coating per day, as cited at 326 IAC 8-2-12(b). Therefore, the requirements of this rule do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Elkhart County and was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

Conclusion

The construction and operation of this modular/mobile home manufacturing facility shall be subject to the conditions of the Minor Source Operating Permit 039-20196-00611.

Appendix A: Summary
VOC and HAP Emissions from the Surface Coating Operations

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Plt ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

Material	Material Usage (gal/hr)	Density (lbs/gal)	Weight % VOC in Material	PTE VOC (tons/yr)	Weight % Hexane in Material	PTE Hexane (tons/yr)	Weight % Xylene in Material	PTE Xylene (tons/yr)	Weight % MEK in Material	PTE MEK (tons/yr)	Weight% Toluene in Material	PTE Toluene (tons/yr)	Weight% Ethyl Benzene in Material	PTE Ethyl Benzene (tons/yr)
Assembly Area														
Dap Spray N Go Enamel	0.01	6.66	75.2	0.18	0.04		5.00	0.003	10.0	0.02	32.0	0.09		
Oatey Pipe Dope 30915 ABS Cement	0.06	7.41	67.6	1.45	0.30				75.0	1.62				
Oatey Great White Pipe Joint w/Teflon	0.01	12.5	0.00	0.00	0.00									
Armstrong Residential Sheet Floor 254	0.23	9.33	0.45	0.04	0.01									
Specialty 1400MR Floor Sealer	0.28	8.60	0.04	0.004	0.00									
Geocel 0405 Painter's Acryl Latex Caulk	0.38	14.2	0.00	0.00	0.00									
Geocel Stainmatch Siding and Trim Sealant	0.03	13.3	2.00	0.04	0.01									
Geocel RP400	0.20	8.26	30.3	2.23	0.50									
NuFlex 136 NonCombust Caulk-Firestop	0.02	15.9	3.10	0.04	0.01									
Enerfoam 42	0.01	10.3	0.00	0.00										
#41 Green Floor Sealer	0.27	8.60	0.00	0.00										
Alpha 5100P Adhesive	1.50	9.33	0.00	0.00										
Sun Adhesive #99 White Glue	1.55	9.16	0.00	0.00										
Roof and Shell Area														
USG Durabond 20	2.05	21.7	0.00	0.00										
Topping Compound	21.3	13.3	0.13	1.58										
Alpha Seal Adhesive 5200 (as applied)	3.39	9.22	1.41	1.93										
ACT Vapor Barrier Paint	3.00	10.0	0.50	0.66										
Final Finish														
Dap Spray N Go Enamel	0.08	6.66	75.2	1.66			5.00	0.13	10.0	0.22	32.0	0.7		
Geocel 0405 Painter's Acryl Latex Caulk	0.03	14.2	0.00	0.00										
Geocel Stainmatch Siding and Trim Sealant	0.02	13.3	2.00	0.02										
Silaprene Solid Bond 300 ml	0.01	9.75	3.50	0.00			3.50	0.01						
Bostik CC-916 Poly Adhesive	0.01	11.4	6.30	0.00			7.00	0.02					1.50	0.004
Cyclo C-31 Glass Clean	0.11	8.33	12.00	0.48										
Enerfoam 42	0.18	10.3	0.00	0.00										
Enerbond 45	0.18	10.3	0.00	0.00										
Miracle SFA66 Construction Adhesive	0.01	9.02	36.6	0.13	7.00	0.02			13.0	0.438	13	0.04		
SW NR4000 Br White Latex Caulk	0.06	13.5	1.49	0.04										
Cyclo C192 Max Clean	0.08	8.33	10.0	0.26										
Shine Up	0.15	7.30	24.4	1.18										
Color Putty	0.06	17.5	0.00	0.00										
USG Easy Sand DW Mu8d	11.5	21.7	0.00	0.00										
Magnum Tuf Set DW Mud	9.38	13.3	0.00	0.00										
Builder Craft Letex Paint B30WF6000	8.00	11.1	4.77	18.57										
Total PTE (tons/yr)				30.52		0.02		0.17		2.30		0.83		0.004

Methodology:

PTE VOC (tons/yr)= Material Usage (gal/hr) x Density (lb/gal) x Weight % VOC x 8760 (hrs/yr) x 1ton/2000 lbs

PTE HAP (tons/yr)= Material Usage (gal/hr) x Density (lb/gal) x Weight % HAP x 8760 (hrs/yr) x 1ton/2000 lbs

Note: Production rate: 1.00 units/hr

Appendix A: Summary
VOC and HAP Emissions from the Surface Coating Operations

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Pit ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

PTE Summary	(tons/yr)
PTE VOC	30.5
PTE Worst HAP	2.30
PTE Total HAP	3.32

**Appendix A: Emission Calculations
Particulate Emissions from the Surface Coating Operations**

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Plt ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

Material	Material Usage (gal/hr)	Density (lbs/gal)	Weight % VOC	Weight % Solids	Application Method	Transfer Efficiency (%)	PTE PM/PM10 Before & After Controls (tons/yr)
Assembly Area							
Dap Spray N Go Enamel	0.01	6.66	75.17%	24.83%	Airless Spray	75%	0.01
Oatey Pipe Dope 30915 ABS Cement	0.06	7.41	67.60%	32.40%	Manual	100%	0.00
Oatey Great White Pipe Joint w/Teflon	0.01	12.5	0.00%	100.00%	Manual	100%	0.00
Armstrong Residential Sheet Floor 254	0.23	9.33	0.45%	52.55%	Manual	100%	0.00
Specialty 1400MR Floor Sealer	0.28	8.60	0.04%	30.00%	Manual	100%	0.00
Geocel 0405 Painter's Acryl Latex Caulk	0.38	14.2	0.00%	99.00%	Manual	100%	0.00
Geocel Stainmatch Siding and Trim Sealant	0.03	13.3	2.00%	96.24%	Manual	100%	0.00
Geocell RP400	0.20	8.26	30.30%	69.70%	Manual	100%	0.00
NuFlex 136 NonCombust Caulk-Firestop	0.02	15.9	3.10%	96.90%	Manual	100%	0.00
Enerfoam 42	0.01	10.3	0.00%	0.00%	Manual	100%	0.00
#41 Green Floor Sealer	0.27	8.60	0.00%	21.00%	Manual	100%	0.00
Alpha 5100P Adhesive	1.50	9.33	0.00%	0.00%	Manual	100%	0.00
Sun Adhesive #99 White Glue	1.55	9.16	0.00%	40.00%	Manual	100%	0.00
Roof and Shell Area							
USG Durabond 20	2.05	21.7	0.00%	100.00%	Manual	100%	0.00
Topping Compound	21.3	13.3	0.13%	50.00%	Manual	100%	0.00
Alpha Seal Adhesive 5200 (as applied)	3.39	9.22	1.41%	98.59%	Manual	100%	0.00
ACT Vapor Barrier Paint	3.00	10.0	0.50%	28.00%	Airless Spray	75%	9.20
Final Finish							
Dap Spray N Go Enamel	0.08	6.66	75.17%	24.83%	Airless Spray	100%	0.00
Geocel 0405 Painter's Acryl Latex Caulk	0.03	14.2	0.00%	99.00%	Manual	100%	0.00
Geocel Stainmatch Siding and Trim Sealant	0.02	13.3	2.00%	96.24%	Manual	100%	0.00
Silaprene Solid Bond 300 ml	0.01	9.75	3.50%	96.50%	Manual	100%	0.00
Bostik CC-916 Poly Adhesive	0.01	11.4	6.30%	93.20%	Manual	100%	0.00
Cyclo C-31 Glass Clean	0.11	8.33	12.00%	0.10%	Airless Spray	75%	0.00
Enerfoam 42	0.18	10.3	0.00%	0.00%	Manual	100%	0.00
Enerbond 45	0.18	10.3	0.00%	0.00%	Manual	100%	0.00
Miracle SFA66 Construction Adhesive	0.01	9.02	36.60%	63.40%	Manual	100%	0.00
SW NR4000 Br White Latex Caulk	0.06	13.5	1.49%	83.50%	Manual	100%	0.00
Cyclo C192 Max Clean	0.08	8.33	10.00%	2.00%	Airless Spray	75%	0.01
Shine Up	0.15	7.30	24.40%	2.00%	Airless Spray	75%	0.02
Color Putty	0.06	17.5	0.00%	100.00%	Manual	100%	0.00
USG Easy Sand DW Mu8d	11.5	21.7	0.00%	100.00%	Manual	100%	0.00
Magnum Tuf Set DW Mud	9.38	13.3	0.00%	100.00%	Manual	100%	0.00
Builder Craft Latex Paint B30WF6000	8.00	11.1	4.77%	46.00%	Air Assisted	75%	44.73
Total							53.98

* Manual application methods include wiping, brush, trowel or extrusion. Transfer efficiency = 100 %

Notes:

Production rate: 1.00 units/hr

The Builder Craft Latex Paint is applied by an air assisted method. The other listed materials are applied by airless methods.

All coating materials not included in these particulate calculations were wiped, extruded, or trowl/brush applied. As homes present a flat target, AP-40 lists a transfer efficiency of 100%. Thus, no particulate emissions are possible for those materials wiped, extruded, or trowl/brush applied.

Methodology:

PTE of PM/PM10 (tons/yr)= Maximum Usage (gal/hour) * Density (lb/gal) * (%Solids) * (1-Transfer efficiency) *8760 hrs/yr *1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Woodworking

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Plant ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

Emissions Unit	Max. Throughput (lbs/hr)	Control Efficiency (%)	Max. Dust Collected (lbs/hr)
Woodworking	7000	0.00	5.00

Note:

Assume all PM emissions are equal to PM10

This operation has no particulate control device.

Most lumber comes in precut. The only cutting comes from odd sized floors and from making small cuts in units.

Therefore, there are very small amounts of sawdust generated. The amount of dust collected was calculated by collecting the dust with a vacuum.

Methodology

Max. Dust Collected (lb/hr) = Dust collected (lbs/hr) x Actual hrs of operation/yr x 1 yr/8760 hrs

PTE Before Controls (tons/yr) = (Max. Dust Collected (lbs/hr) x 8760 hrs/yr/2000 lbs/ton)/(Control Efficiency%)

Compliance with 326 IAC 6-3-2(e) - Particulate Matter Emissions Limitations

Maximum Allowable Emissions = $E = 4.10 * P^{0.67}$

Where:

P = Process Rate in tons per hour

E = Rate of Emissions in pounds per hour

Maximum Allowable Emissions = **9.49 lbs/hr**

Emission Unit	Allowable Emissions (lbs/hr)	Calculated Emissions (lbs/hr)
Woodworking	9.49	5

Thus, this woodworking operation is in compliance with 326 IAC 6-3-2 without the use of a control device.

**Appendix A: Emission Calculations
Combustion Emissions - Gas-Fired Space Heaters**

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Plt ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

Natural Gas-Fired Space Heaters (Insignificant Activity)

Max. Potential Throughput (MMCF/yr)	Total Heat Input Capacity (MMBtu/hr)	Description
62.5	7.13	31 Natural Gas-fired Space Heaters and 2 air make up units with a total heat capacity of 7.13 MMBtu/hr. No one unit is greater than 0.5 MMBtu/hr.

	Pollutant						
	PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
Emission Factor	7.6	7.6	0.6	100.0	84.0	5.5	0.09
(units)	(lbs/ MMCF)	(lbs/ MMCF)	(lbs/ MMCF)	(lbs/ MMCF)	(lbs/ MMCF)	(lbs/ MMCF)	(lbs/ MMCF)

Emission Unit	Potential To Emit (tons/yr)						
	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
Space Heaters	0.24	0.24	0.02	3.12	2.62	0.17	0.00
Totals	0.24	0.24	0.02	3.12	2.62	0.17	0.00

*PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100

Emission Factors from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

1000 Btu per cubic foot of natural gas

Methodology

Max. Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000,000 cubic feet gas x 1 cubic feet gas/ 1,000 Btu x 1,000,000 Btu/MMBtu.

PTE for PM, PM10, NO_x, SO₂, CO, VOC and HAPs (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations
Summary**

Company Name: Forest River Housing, Inc.
Address: 66700 State Road 19, Wakarusa, Indiana, 46573
Permit Number: 039-20196-00611
Plt ID: 039-00611
Reviewer: ERG/HJ
Date: October 19, 2004

POTENTIAL TO EMIT IN TONS PER YEAR (CRITERIA POLLUTANTS)

Process	PM	PM10	SO₂	NOx	VOC	CO
Surface Coating	54.0	54.0	0.00	0.00	30.5	0.00
Combustion	0.24	0.24	0.02	3.12	0.17	2.62
Woodworking	21.9	21.9	0.00	0.00	0.00	0.00
TOTAL	76.1	76.1	0.02	3.12	30.7	2.62