



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: July 26, 2006
RE: Forest River Inc. / 039-22760-00295
FROM: Nisha Sizemore
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 03/23/06



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Forest River, Inc.
58277 State Rd 19 South and 27824 County Rd 20
Elkhart, Indiana 46517**

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

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.

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Issued by: Original signed by Nisha Sizemore, Branch Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2006 Expiration Date: July 26, 2011

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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.3 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 stationary RV Manufacturing Facility.

Authorized Individual:	V.P. of Engineering
Source Address:	58277 State Rd 19 South and 27824 County Rd 20, Elkhart, IN 46517
Mailing Address:	P.O. Box 3030, Elkhart, IN 46515-3030
General Source Phone Number:	(574) 296-7700
SIC Code:	3716, 3792
County Location:	Elkhart
Source Location Status:	Nonattainment for Ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

A.2 Minor Source Operating Permit Source Definition

The Source Definition from M039-10341-00295 was incorporated into this permit as follows:

This towable and motorize recreational vehicle company consists of two (2) plants:

- (a) Plant 1 is located at 58277 State Road 19 South, Elkhart, IN 46517; and
- (b) Plant 2 is located at 27824 County Road 20 (also known as Mishawaka Road), Elkhart, IN 46517

Since the two (2) plants are about one (1) mile apart from each other, are operating under common ownership, have the same SIC Codes (3716 and 3792), and Plant 2 (the Mishawaka Road) plant provides more than 50% of the welded items to the Plant 1, they will be considered one source.

One combined Minor Source Operating Permit will be issued to Forest River, Inc. The plant ID for the combined source is 039-00295.

A.3 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

Plant 1 consists of the following emission units:

- (a) One (1) recreational vehicle (RV) Assembly Line, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour;

- (c) One (1) body putty application process, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;
- (d) One (1) side wall and roof assembly lamination process, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour;
- (e) One (1) Foam Seal Shop, extruding urethane foam sealant into the cavities of plastic RV bodies; and
- (f) One (1) woodworking operation, identified as Cabinet Shop, with a maximum process weight rate of 500 pounds of lumber per hour, equipped with one (1) cyclone for particulate matter control.

Plant 2 consists of the following emission units:

- (g) Five (5) metal inert gas (MIG) Welding Stations, with a combine maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour; and
- (h) One (1) side wall and roof assembly lamination process, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, 039-22760-00295, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

-
- (a) Where specifically designated by this permit or required by an applicable requirement, any

application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) an "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice 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, 46204-2251
- (c) 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.10 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) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 039-22760-00295 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Deviations from Permit Requirements and Conditions

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this

permit; and

- (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (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 46204-2251

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

B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 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, any records that must be kept under the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 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), to determine the appropriate permit fee.

B.20 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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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.

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
Indianapolis, Indiana 46204-2251

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 2-1.1-1(1).

- (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.

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 [326 IAC 2-6.1-5(a)(2)]

C. 8 Compliance Monitoring [326 IAC 2-1.1-11]

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.9 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.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
- (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

C.12 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.13 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 within ninety (90) days of permit issuance.

C.14 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 46204-2251
- (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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) recreational vehicle (RV) Assembly Line, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(d), the Plastic Skirt and Touch-up Paint Booth surface coating operations shall be controlled by a dry particulate filter, waterwash, or an equivalent control device operated in accordance with the manufacturer's specifications. If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such an observation.

- (a) Repair control device so that no overspray is visibly detected at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detected at the exhaust or accumulates on the ground.

If over spray is visibly detected, the source shall maintain a record of the action taken as a result of an inspection, any repairs of control devices, 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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to MSOP 039-10341-00295, the Best Available Control Technology (BACT) for the Assembly Line has been determined to be a VOC limitation of 52 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the following work practice standards:

- (a) Forest River Inc. shall apply all sealants, adhesives, and cleaners with extrusion ("squeeze tubes"), brushing, and hand wiping techniques.
- (b) Minor amounts of paint shall be applied using aerosol spray cans which is a form of airless spray technology.
- (c) Employees shall close open containers when not in use.

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 its control device.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.2.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
- (b) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with condition D.1.1.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) body putty application process, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;
- (g) One (1) woodworking operation, identified as Cabinet Shop, with a maximum process weight rate of 500 pounds of lumber per hour, equipped with one (1) cyclone for particulate matter control;
- (h) Five (5) metal inert gas (MIG) Welding Stations, with a combine maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate 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:

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

- (a) The particulate emissions from the woodworking identified as the Cabinet Shop shall not exceed 1.62 lbs per hour based on process weight rate of 0.250 tons per hour.
- (b) The particulate emissions from the five (5) MIG Welding Stations combined shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour. The particulate emissions from the one (1) Stick Welding Station shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour.
- (c) The particulate emissions from the body putty application process identified as Paint Prep Shop, shall not exceed 26.1 pounds per hour based on a process weight rate of 15.8 tons per hour.

Compliance Determination Requirements

D.2.2 Particulate Emissions

In order to comply with D.2.1(a), the cyclone shall be in operation at all times the woodworking identified as the Cabinet Shop is in operation.

**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, Inc.
Address:	58277 State Road 19 South and 27824 County Rd 20
City:	Elkhart, IN 46517
Phone #:	(260) 437-9012
MSOP #:	039-22760-00295

I hereby certify that Forest River, Inc. is still in operation.
 no longer in operation.

I hereby certify that Forest River, Inc. is in compliance with the requirements of MSOP 039-22760-00295.
 not in compliance with the requirements of MSOP 039-22760-00295

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:

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 (MSOP) Renewal

Source Name: Forest River, Inc.
Source Location: 58277 State Road 19 South and 27824 County Rd 20, Elkhart, IN 46517
County: Elkhart
SIC Code: 3716, 3792
Operation Permit No.: M039-22760-00295
Permit Reviewer: Sarah Slack

On May 27, 2006, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Forest River, Inc. had applied for a Minor Source Operating Permit (MSOP) renewal for an operation that manufactures RVs. The notice also stated that OAQ proposed to issue a MSOP renewal for this operation and provided information on how the public could review the proposed MSOP renewal 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 renewal should be issued as proposed.

Comments on the proposed MSOP renewal were received on July 6, 2006 from Jim Euler of DECA Environmental and Associates Inc., on behalf of Forest River, Inc.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been revised as appropriate.

Comment 1:

The permittee requests that IDEM use its discretion and not require Forest River to submit quarterly reports, but to maintain recordkeeping at the plant level for inspection and proof of compliance. Now that the potential VOC emissions of the Assembly Line are less than 24 tons per year and a decline has occurred in the RV industry sales, the permittee does not consider it beneficial for IDEM to require reporting for this source especially since it has not been required in the past.

Response 1:

IDEM, OAQ agrees as previously determined in M 039-10341-00295 reporting is not necessary to determine compliance with the requirements of 326 IAC 8-1-6 contained in condition D.1.2. This requirement and the associated reporting form are therefore being removed from the permit.

~~D.1.6 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.~~

~~* * *~~

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section**

Quarterly Report

Company Name: Forest River, Inc.
Location: 58277 State Road 19 South and 27824 Country Rd, Elkhart, IN 46517
Permit No.: 039-22760-00295
Source: Assembly Line
Pollutant: VOC usage
Limit: .52 tons per 12 consecutive month period with compliance determined at the end of each month.

Year: _____

Quarter: _____

Month	This Month Usage (tons)	Previous 11 Months Usage (tons)	12-Month Total Usage (tons)
Month 1			
Month 2			
Month 3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

OAQ Change 1:

Upon further review, IDEM, OAQ has made the following revision to the cover page. This condition was inadvertently omitted from this permit:

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

OAQ Change 2:

Upon further review, IDEM, OAQ has made the following revision to Condition A.1 to correct the phone number at the source:

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

The Permittee owns and operates stationary RV Manufacturing Facility.

Authorized Individual:	V.P. of Engineering
Source Address:	58277 State Rd 19 South and 27824 County Rd 20, Elkhart, IN 46517
Mailing Address:	P.O. Box 3030, Elkhart, IN 46515-3030
General Source Phone Number:	(260) 437-9012 (574) 296-7700
SIC Code:	3716, 3792
County Location:	Elkhart
* * *	

OAQ Change 3:

Upon further review, IDEM, OAQ has made the following revision to Condition A.2 to correct a misspelling:

A.2 Minor Source Operating Permit Source Definition

The Source Definition from M039-10341-00295 was incorporated into this permit as follows:

This towable and motorize recreational vehicle company consists of two (2) plants:

- (a) Plant 1 is located at 58277 State Road 19 South, Elkhart, IN 46517; and
- (b) Plant 2 is located at 27824 County Road 20 (also known as ~~Mishiwaka~~ **Mishawaka** Road), Elkhart, IN 46517

Since the two (2) plants are about one (1) mile apart from each other, are operating under common ownership, have the same SIC Codes (3716 and 3792), and Plant 2 (the ~~Mishiwaka~~ **Mishawaka** Road) plant provides more than 50% of the welded items to the Plant 1, they will be considered one source.

One combined Minor Source Operating Permit will be issued to Forest River, Inc. The plant ID for the combined source is 039-00295.

OAQ Change 4:

Upon further review, IDEM, OAQ has made the following revision to Section C. This condition was inadvertently omitted from this permit:

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.**

OAQ Change 5:

Upon further review, IDEM, OAQ has made the following revision to Condition C.10 to clarify the

condition:

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale

- (b) The Permittee may request that IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

OAQ Change 6:

Upon further review, IDEM, OAQ has made the following revision to the Malfunction Report to correct the fax number:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - ~~317-233-5967~~ **317-233-6865**

* * *

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

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

Source Background and Description

Source Name:	Forest River, Inc.
Source Location:	58277 State Road 19 South and 27824 County Rd 20, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3716, 3792
Operation Permit No.:	039-10341-00295
Operation Permit Issuance Date:	June 12, 2001
Permit Renewal No.:	039-22760-00295
Permit Reviewer:	Sarah Slack

The Office of Air Quality (OAQ) has reviewed an application from Forest River, Inc. relating to the construction and operation of stationary RV Manufacturing Facility.

Source Definition

The Source Definition from M 039-10341-00295 was incorporated into this permit as follows:

This towable and motorize recreational vehicle company consists of two (2) plants:

- (a) Plant 1 is located at 58277 State Road 19 South, Elkhart, IN 46517; and
- (b) Plant 2 is located at 27824 County Road 20 (also known as Mishiwaka Road), Elkhart, IN 46517

Since the two (2) plants are about one (1) mile apart from each other, are operating under common ownership, have the same SIC Codes (3716 and 3792), and Plant 2 (the Mishiwaka Road) plant provides more than 50% of the welded items to the Plant 1, they will be considered one source.

Permitted Emission Units and Pollution Control Equipment

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

Plant 1 consists of the following emission units:

- (a) One (1) recreational vehicle (RV) Assembly Line, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour;
- (c) One (1) body putty application process, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;

- (d) One (1) side wall and roof assembly lamination process, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour;
- (e) One (1) Foam Seal Shop, extruding urethane foam sealant into the cavities of plastic RV bodies; and
- (f) One (1) woodworking operation, identified as Cabinet Shop, with a maximum process weight rate of 500 pounds of lumber per hour, equipped with one (1) cyclone for particulate matter control.

Plant 2 consists of the following emission units:

- (g) Five (5) metal inert gas (MIG) Welding Stations, with a combine maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour.
- (h) One (1) side wall and roof assembly lamination process, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour.

Existing Approvals

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

- (a) M 039-10341-00295 issued on June 12, 2001; and
- (b) NOC 039-19576-00295 issued on September 14, 2004.

All conditions from previous approvals were incorporated into this MSOP except the following:

M 039-10341-00295 issued on June 12, 2001

Condition D.1.1:

Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (b) Any change or modification which would increase the potential to emit VOC from the one (1) surface coating spray booth, identified as Plastic Skirt and Touch-up Paint Booth to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

Reason not incorporated: Condition D.1.1(b) will be removed because it is not an enforceable limit.

Enforcement Issue

There are no enforcement actions pending.

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 complete application for the purposes of this review was received on March 10, 2006.

Emission Calculations

See Appendix A (pages 1 through 7) of this document for detailed emission calculations.

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	71.20
PM-10	71.20
SO ₂	Negligible
VOC	35.22
CO	Negligible
NO _x	Negligible

HAPs	Potential to Emit (tons/yr)
MEK	0.96
Toluene	1.79
Xylene	1.17
Hexane	0.20
Ethyl-benzene	0.16
MIBK	0.02
Mn	0.06
Cr	0.01
Total	4.37

- (a) The potential to emit of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit of PM-10 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.
- (c) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit any combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (d) 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-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment
PM-2.5	Attainment

- (a) Volatile organic compounds VOC and Nitrogen Oxides (NO_x) 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_x 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_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable for all other 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	71.20
PM-10	71.20
SO ₂	Negligible
VOC	35.22
CO	Negligible
NO _x	Negligible
Single HAP	1.79
Combination HAPs	4.37

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, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-22760-00295, is still 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) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit. 40 CFR 63 subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) is not included in this permit because this source is not a major source of HAPs. 40 CFR 63 subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) is not included in this permit because this source is not a major source of HAPs. 40 CFR 63 subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) is not included in this permit because this source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source which was constructed in 1992, is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants are less than 250 tons per year and there have been no major modifications to the source.

326 IAC 2-3 (Emission Offset)

The source which was constructed in 1992, is not subject to the requirements of 326 IAC 2-3 because the potential to emit NO_x and VOC is less than 100 tons per year and there have been no major modifications to the source.

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

The source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year.

326 IAC 2-6 (Emission reporting)

The source is not subject to the requirements of 326 IAC 2-6 because this source is located in Elkhart county and is not required to have an operating permit under 326 IAC 2-7 and does not emit lead into the ambient air at levels equal to or greater than 5 tons per year.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-3-2 (Particulate Emissions Limitations)

- (a) Pursuant to 326 IAC 6-3-1(b)(12), 326 IAC 6-3 does not apply to the aerosol coating applied in the Assembly Line. In addition, pursuant to 326 IAC 6-3-1(b)(14), 326 IAC 6-3 does not apply to the Assmby Line because potential particulate emissions are less than 0.551 pounds per hour.
- (b) The Plastic Skirt and Touch-up Paint Booth is subject to the requirements of 326 IAC 6-3-2(d). This surface coating operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device operated in accordance with the manufacturer's specifications. If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such an observation:
 - (1) Repair control device so that no overspray is visibly detected at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detected at the exhaust or accumulates on the ground.

If over spray is visibly detected, the source shall maintain a record of the action taken as a result of an inspection, any repairs of control devices, 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.

- (c) Pursuant to 326 IAC 6-3-2(e), the particulate from the woodworking identified as Cabinet Shop, the Welding Stations, and the body putty process identified as Paint Prep Shop 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:

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

- (1) The particulate emissions from the woodworking identified as the Cabinet Shop shall not exceed 1.62 lbs per hour based on a process weight rate of 0.250 tons per hour. The cyclone shall be in operation at all times the woodworking identified as the Cabinet Shop is in operation, in order to comply with this limit.
- (2) The particulate emissions from the five (5) MIG Welding Stations combined shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour. The particulate emissions from the one (1) Stick Welding Station shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour. The source complies with this limit without the use of a control device.
- (3) The particulate emissions from the body putty application process identified as the Paint Prep Shop shall not exceed 26.1 pounds per hour based on a process

weight rate of 15.8 tons per hour. The source complies with this limit without the use of a control device.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

The coating operations at this source do not coat automobiles and light duty trucks designed primarily for the purpose of transportation. Therefore, the coating operations are not subject to 326 IAC 8-2-2.

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

The coating operations at this source do not include metal coating. Therefore, the coating operations are not subject to 326 IAC 8-2-9.

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

The requirements of 326 IAC 8-1-6 do not apply to the Plastic Skirt and Touch-up Paint Booth because it has potential emissions of VOC less than 25 tons per year. The requirements of 326 IAC 8-1-6 do not apply to the Foam Seal Shop because it does not emit VOC.

Pursuant to 326 IAC 8-1-1(a), a facility subject to 326 IAC 8-1-6 shall remain subject to 326 IAC 8-1-6 notwithstanding any subsequent decreases in VOC emissions unless the source has a federally-approved SIP revision of less than 15 pounds per day actual VOC emissions before add-on controls. Even though the PTE has decreased below 25 tons per year for the Assembly Line, the facility is still subject to 326 IAC 8-1-6 because the source does not have a federally-approved SIP revision limiting emissions to less than 15 pounds per day actual VOC emissions before add-on controls. Pursuant to MSOP 039-10341-00295, the Best Available Control Technology (BACT) for the Assembly Line has been determined to be a VOC limitation of 52 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the following work practice standards:

- (a) Forest River Inc. shall apply all sealants, adhesives, and cleaners with extrusion ("squeeze tubes"), brushing, and hand wiping techniques.
- (b) Minor amounts of paint shall be applied using aerosol spray cans which is a form of airless spray technology.
- (c) Employees shall close open containers when not in use.

Conclusion

The operation of this stationary RV Manufacturer shall be subject to the conditions of this Minor Source Operating Permit Renewal 039-22760-00295.

Appendix A: Emission Calculations

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 & 27824 County Road 20, Elkhart, IN 46517
MSOP Renewal: 039-22760
Plt ID: 039-00295
Reviewer: Sarah Slack

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Assembly Line	Paint Prep Shop	Plastic Skirt and Touch-up Paint Booth	Welding Shop	Cabinet Shop (Woodworking)	TOTAL
PM	0.50	6.02	0.52	1.09	63.07	71.20
PM10	0.50	6.02	0.52	1.09	63.07	71.20
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00
VOC	23.91	0.00	11.31	0.00	0.00	35.22
CO	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	1.82	0.00	2.47	0.08	0.00	4.37
worst case single HAP	0.76	0.00	1.03	0.06	0.00	1.03
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Assembly Line	Paint Prep Shop	Plastic Skirt and Touch-up Paint Booth	Welding Shop	Cabinet Shop (Woodworking)	TOTAL
PM	0.50	6.02	0.52	1.09	6.31	14.44
PM10	0.50	6.02	0.52	1.09	6.31	14.44
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00
VOC	23.91	0.00	11.31	0.00	0.00	35.22
CO	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	1.82	0.00	2.47	0.08	0.00	4.37
worst case single HAP	0.76	0.00	1.03	0.06	0.00	1.03
Total emissions based on rated capacity at 8,760 hours/year, after control.						

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

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 & 27824 County Road 20, Elkhart, IN 46517
MSOP Renewal: 039-22760
Pit ID: 039-00295
Permit Reviewer: Sarah Slack

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % Hexane	Weight % Ethylene Glycol	Weight % Hexamethylene-1, 6-diisocyanate	Weight % MIBK	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Hexamethylene-1, 6-diisocyanate Emissions (ton/yr)	MIBK Emissions (ton/yr)
Assembly Line																			
ABS Cement	7.09	0.00985	1.375	75.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS Cleaner	6.61	0.00394	1.375	95.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Black Paint	7.9	0.12500	1.375	0.00%	8.16%	5.29%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.49	0.31	0.00	0.00	0.00	0.00	0.00
Sealer	11.31	0.00358	1.375	6.06%	30.70%	13.62%	0.00%	0.00%	0.00%	0.00%	6.70%	0.01	0.07	0.03	0.00	0.00	0.00	0.00	0.02
PreCleaner	6.37	0.03580	1.375	0.00%	14.51%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.00
Contact Adhesive	8.2	0.00808	1.375	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00
Spray Go Paint	6.088	0.00200	1.375	10.00%	5.00%	10.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00
Sta-Put Adhesive	6.505	0.00444	1.375	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00
Plastic Skirt and Touch-up Paint Booth																			
Reducer	7.21	0.05280	1.375	0.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.18	0.00	0.00	0.00	0.00	0.00	0.00
Hardener	7.84	0.00350	1.375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Stabilizer	7.25	0.07170	1.375	0.00%	27.00%	26.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.85	0.81	0.16	0.00	0.00	0.00	0.00
7000 Base	9.2	0.12200	1.375	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total Potential Emissions 0.96 1.79 1.17 0.16 0.20 0.00 0.00 0.02

METHODOLOGY **Total HAPs = 4.30**

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: Emissions Calculations
VOC and Particulate
From Paint Prep Shop**

Company Name: Forest River, Incorporated
Address City IN Zip: 58277 State Road 19 South & 27824 County Road 20, Elkhart, IN 46517
MSOP Renewal: 039-22760
Pit ID: 039-00295
Reviewer: Sarah Slack

Paint Prep Shop Emissions

$$1 \text{ lb putty/RV} \times 1.375 \text{ RV/hr} = \mathbf{1.375 \text{ lb/hr}}$$

$$\text{PM/PM10} \quad 1.375 \text{ lb/hr} \times 8760 \text{ hr/yr} / 2000 \text{ lb/ton} = \mathbf{6.02 \text{ tons/yr}}$$

Allowable PM/PM10 emissions

$$4.1 \times (15.8 \text{ tons/hr})^{\wedge} 0.67 = \mathbf{26.05 \text{ lbs PM/hr}}$$

$$= \mathbf{114.12 \text{ tons PM/yr}}$$

Potential emissions are less than the allowable emissions, thus the source will comply with 326 IAC 6-3-2

Company Name: Forest River, Inc.
 Address City IN Zip: 58277 State Road 19 & 27824 County Road 20, Elkhart, IN 46517
 MSOP Renewal: 039-22760
 Plant ID: 039-00295
 Reviewer: Sarah Slack

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(ER70S)	5	5.75575	0.0052	0.000318	0.0001	0.0001	0.150	0.009	0.003	0.003	0.015
Stick (E7018 electrode)	1	4.66125	0.0211	0.0009	--	--	0.098	0.004	0.000	0.000	0.004
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.25	0.01	0.00	0.00	0.02
Potential Emissions lbs/day							5.95	0.32	0.00	0.07	0.46
Potential Emissions tons/year							1.09	0.06	0.00	0.01	0.08

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

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" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.